

EXHIBIT 3

1 IN THE UNITED STATES DISTRICT COURT FOR THE
2 NORTHERN DISTRICT OF OKLAHOMA
3
4 AMANDA FEENSTRA, et al.,
5 Plaintiff,
6 vs. Case No. 19-cv-234-JFH-FHM
7
8 JARED SIGLER, et al.,
9 Defendants.

10
11
12 DEPOSITION OF SHARONICA CARTER
13 TAKEN ON BEHALF OF THE DEFENDANTS
14 ON NOVEMBER 2, 2020, BEGINNING AT 10:44 A.M.
(via Zoom)

15
16
17 APPEARANCES

18 On behalf of the PLAINTIFFS:

19 Michael Lacovara
Alysha Naik
20 LATHAM WATKINS
885 Third Avenue
21 New York, New York 10022
212.906.1605
22 michael.lacovara@lw.com
alysha.naik@lw.com
23 lilia.vazova@lw.com

24
25 REPORTED BY: Karen Dauphin Albert, CSR, RPR

1 APPEARANCES (continued)

2

On behalf of the OIDS DEFENDANTS:

3

Jon M. Williford
OKLAHOMA ATTORNEY GENERAL
313 NE 21st Street
Oklahoma City, OK 73105
405.522.2944
jon.williford@oag.ok.gov

7

On behalf of the DEFENDANT STATE JUDGES:

8

Devan A. Pederson
OKLAHOMA ATTORNEY GENERAL
313 NE 21st Street
Oklahoma City, OK 73105
405.522.2931
devan.pederson@oag.ok.gov

10

12

13

14

15

16

17

18

19

20

21

22

23

24

25

1
2
3 INDEX

4		Page
5	Direct Examination by Mr. Pederson	5
6	Cross Examination by Mr. Williford	130

7
8
9 EXHIBITS

10	Exhibit	Page
11		
12	1 Plea agreement	105
13	2 Transcript of hearing	105
14	3 Order	109

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

STIPULATIONS

It is stipulated that the deposition
of SHARONICA CARTER may be taken by notice,
pursuant to the Federal Rules of Civil
Procedure, on November 2, 2020, before Karen
Dauphin Albert, Certified Shorthand Reporter.

1 SHARONICA CARTER,
2 having been first duly sworn, deposes and says in
3 reply to the questions propounded as follows:

4 DIRECT EXAMINATION

5 BY MR. PEDERSON:

6 Q Ms. Carter, my name is Devan Peterson.
7 I'm the one wearing the mask here. I'm wearing
8 this mask because I'm in the office with other
9 people, and they don't want to get what, if
10 anything, I might have. So I hope you'll excuse
11 that.

12 A Yes, sir.

13 Q I represent Judges Thomas, Vaclaw, and
14 Sigler in the lawsuit that you have filed.

15 Do you understand that?

16 A Yes, sir.

17 Q I'm going to be asking you some
18 questions today about that lawsuit.

19 You've had a chance to talk to your
20 attorneys, and you know what we're doing here
21 today?

22 A Yes, sir.

23 Q Have you ever given a deposition before,
24 like what we're doing today?

25 A No, sir.

1 Q Have you ever given testimony under oath
2 to a court reporter outside of a courtroom?

3 A No, sir.

4 Q Have you ever been involved in any other
5 lawsuits other than this one?

6 A No, sir.

7 Q Since you haven't done a deposition, let
8 me just tell you. If you don't hear me or --

9 Are you able to hear me right now?

10 A Yes, sir.

11 Q If you have trouble hearing me or you
12 don't understand what I'm asking you, please
13 feel free to just ask me to restate my question
14 or speak up or whatever you need to do.

15 A Yes, sir.

16 Q if you need to take a break, just say
17 so, and we can take a break.

18 A Okay.

19 Q Let me just start by getting a little
20 bit about of your background.

21 Where were born?

22 A Vicksburg, Mississippi.

23 Q How long did you live there?

24 A I've never lived there. I lived in
25 Tallulah, Louisiana. It's just the hospital

1 that -- it's a small town. So it's the hospital
2 that everybody goes to.

3 Q Okay. I understand.

4 Where did you live in your young
5 childhood?

6 A I lived in Tallulah, Louisiana, and
7 Tulsa, Oklahoma.

8 Q When did you first move to Tulsa?

9 A I think 2006, after Katrina.

10 Q When you first moved to Tulsa, how old
11 were you?

12 A Eleven and a half.

13 Q Who did you live with when you first
14 moved to Tulsa at that time?

15 A My mother.

16 Q What's her name?

17 A Demetra Carter.

18 Q Did you live with anyone else?

19 A My aunt, Shannon Carter.

20 Q What was her first name?

21 A Shannon, S-h-a-n-n-o-n.

22 Q And she lived there with you and your
23 mom?

24 A Yes, sir.

25 Q Do you remember the address, your first

1 address in Tulsa?

2 A No, sir.

3 Q Do you remember about where you lived in
4 Tulsa at that time?

5 A I'm sorry. Can you repeat that?

6 Q Do you remember about where you lived in
7 Tulsa, what part of town or anything?

8 A When I first -- when we first moved down
9 there, we was on the side by Hamilton Middle
10 School and Bryant Elementary. So I'm guessing
11 the east side of Tulsa.

12 Q Where did you live after that?

13 A Comanche Park Apartments.

14 Q Is that also in Tulsa?

15 A Yes, sir.

16 Q Who did you live there with?

17 A My mother.

18 Q Anyone else?

19 A My siblings, and that was it.

20 Q Who were those siblings that you lived
21 with at that time?

22 A Akilia Cater, Lakendra Carter,
23 Kamareanna Carter, Drizze Jackson, Deandrea
24 Carter, and Nehemiah Jackson.

25 Q All right. Anyone else?

1 A No, sir.

2 THE REPORTER: Can I just get all of
3 those spellings after the depo --

4 MR. PEDERSON: Yes, ma'am.

5 THE WITNESS: Yes, ma'am.

6 THE REPORTER: -- or on a break?

7 Thanks. I won't interrupt.

8 THE WITNESS: Yes, ma'am.

9 MS. NAIK: And, Sharonica, that's just a
10 good reminder to just speak slowly so the
11 reporter can take everything down.

12 THE WITNESS: Okay.

13 THE REPORTER: It's mainly all of the
14 spellings that I need to get too.

15 MS. NAIK: Okay. Great.

16 THE REPORTER: Thanks.

17 THE WITNESS: Okay.

18 Q (By Mr. Pederson) Approximately what
19 were the dates you lived at Comanche Park
20 Apartments?

21 A You say what, sir?

22 Q What dates, approximately, did you live
23 at Comanche Park Apartments?

24 A I don't remember. I know it's like a
25 year or two.

1 Q Do you remember what grade you were in?

2 A Sixth.

3 Q Where did you live after that?

4 A Was it Seminole? Seminole Apartments.

5 Q Okay.

6 A In Tulsa, Oklahoma.

7 Q How long did you live there?

8 A Until about -- yeah. A couple of years.

9 Q Okay.

10 THE REPORTER: I'm not able to get the
11 person that's talking with her. I can't hear
12 her.

13 Do I need to try to write down what the
14 person is saying in the room?

15 Q (By Mr. Pederson) It might be better,
16 Sharonica, if you just tried to answer based on
17 your knowledge. I know your mom is probably
18 there helping you remember all these things, but
19 that's okay.

20 A Okay.

21 Q If you can't remember, you can just say,
22 "I don't remember."

23 A Okay. It was a couple of years.

24 Q How about after that, if you recall?

25 A After then, I was the penitentiary.

1 Q Okay. And how about school? Did you go
2 to school -- what's the last grade you
3 completed?

4 A Tenth.

5 Q Tenth. Okay.

6 A And I completed career tech. I
7 graduated from career tech, technology school.

8 Q Let's see. What high school did you go
9 to when you were in tenth grade?

10 A I did that through jail.

11 Q Was that when you were in OJA or a
12 different place?

13 A When I was in OJA, I couldn't pass the
14 GED test. So they just told me to take the
15 career -- take the technology part, take the
16 technology and see if I could pass that, and I
17 graduated out of technology school. So I was on
18 Mabel Bassett yard.

19 Q What's the last high school you have
20 attended? Did you go to a high school in ninth
21 grade?

22 A I don't think I made it to ninth grade.
23 I think they had like -- okay. When I was in
24 eighth grade, they said all the kids that are a
25 little bit older, we're going to take you out to

1 8.5, meaning, like, you're in the eighth grade,
2 but you're taking ninth grade classes, and they
3 switched us from Gilcrease Middle School to
4 McLain High School.

5 Q McLain High School in Tulsa?

6 A Yes, sir.

7 Q Let me ask a little bit about your -- so
8 you had career tech. Any other training or
9 education other than career tech and other than
10 what you've already told me about that you can
11 recall?

12 A No, sir.

13 Q Career tech, what kind of things did you
14 learn in that program?

15 A Forklifting, warehouse manufacturing,
16 building, like wood shop, things like that.

17 Q How long of a program was that?

18 A It was a year program.

19 Q And you had tests and things that you
20 needed to pass?

21 A Yes, sir. And I passed. I graduated.

22 Q As a result of that, did you receive any
23 licenses or permits or anything?

24 A Yes. I have my forklift certification
25 and -- oh, it's something else. I don't

1 remember what it is. But I have certificates
2 for those.

3 Q The forklift certification, is that
4 something you need to renew, or is that
5 something that once you have it, you have it?

6 A He didn't tell me I have to renew it.
7 So I'm under the impression that it's okay.

8 Q Operating a forklift, I mean, that's a
9 job skill. Any other job skills in particular
10 you can recall gaining as part of that program?

11 A No, sir.

12 Q You said something about wood shop?

13 A Yes.

14 Q What kind of training did they provide
15 you with regard to wood shop?

16 A Like measurements, a little OSHA
17 training. I think there was something else. A
18 material sheet, like, they taught me how to read
19 those and things like that.

20 Q Oh, a material safety sheet?

21 A It's like a graph sheet where you learn
22 measurements and take measurements on wood and
23 things like that. Just like if it's
24 contaminated and all that, like, I have to go in
25 and be able to spot that and write it down and

1 things like that.

2 Q I understand.

3 Did you say something about warehouse
4 management or something like that?

5 A Yeah. Warehouse manufacturing is like
6 -- okay. They prepped me to, like, run machines
7 -- to run machines, to, like, learn how to,
8 like, box things up the proper way, things like
9 that. That's with the warehousing and
10 manufacturing part. That's what they showed me
11 on that part.

12 Q You already mentioned forklift. Any
13 other type of machines?

14 A No, sir.

15 Q Before the time that you went into OJA
16 custody, did you have any other jobs or do any
17 work or have any employment prior to that time?

18 A No, sir. I was playing basketball.

19 Q When you were in OJA, what facility were
20 you at, or was it different ones?

21 A COJC.

22 Q COJC. Okay.

23 When you were in COJC, describe COJC for
24 me. What is that like? Like what did you do on
25 a day-to-day basis?

1 A You go to school. If you're a youthful
2 offender, you go to YO group.

3 THE REPORTER: What group? I'm sorry.

4 THE WITNESS: If you're a youthful
5 offender, they call it YO group, youthful
6 offender group. So you have to go, and you've
7 got to talk to the counselor and things like
8 that.

9 School, YO groups, we exercised, things
10 like that.

11 Q **(By Mr. Pederson) Did you stay there?**
12 **Did you sleep there and --**

13 A Yes.

14 Q **Okay.**

15 A Yes, sir.

16 Q **Were you free to come and go to that, or**
17 **was that kind of --**

18 A No, sir. It's a --

19 Q **Is that a --**

20 A A juvenile is a prisoner.

21 Q **Okay. So it's like juvenile**
22 **incarceration?**

23 A Yes, sir.

24 Q **When you went to school in the OJA**
25 **program at COJC, that's when you did this**

1 training you talked about. Did you study --

2 A No. I did career tech in Mabel Bassett.
3 That's another yard.

4 Q Oh, I'm sorry. I'm sorry.

5 A Yeah. That's an adult yard. COJC is a
6 juvenile yard, and Mabel Bassett is an adult.

7 Q What grade did they put you in at COJC,
8 if they categorized it like that?

9 A I was finishing the ninth.

10 Q And did you finish ninth?

11 A I didn't finish -- oh, well, yeah, I did
12 finish it there because I went to the tenth.

13 Yeah. I finished ninth grade there,
14 but --

15 Q What kind of courses did you take in
16 ninth and tenth grade at COJC?

17 A I mean, they give us all, like, the same
18 courses: science, history, social studies, math,
19 things like that. The basics.

20 Q Did you have any vocational classes at
21 COJC?

22 A No, sir.

23 Q Nothing like teaching you how to do a
24 job or anything at COJC?

25 A No, sir.

1 Q When you were in OJA custody -- I'm
2 sorry. You might have already said this -- you
3 weren't anywhere else other than COJC.

4 Is that your understanding?

5 A I was at COJC until they moved us from
6 COJC to Mabel. Because it's coed, they moved
7 all the girls from COJC to Southern Plains, I
8 think, in Norman, Oklahoma, and I left and went
9 home from there.

10 Q About how long were you at Southern
11 Plains? Do you recall?

12 A About six months at the most.

13 Q Was that the same kind of institution as
14 COJC?

15 A No. No. Southern Plains is like for
16 suicidal people, people -- that's what that is.

17 So, no, that's not the same at all.

18 Q Did you get moved there -- what's your
19 understanding of why you were moved there, if
20 you know?

21 A From my understanding, they moved all of
22 the girls off the COJC yard because it was coed.
23 The boys kept trying to get to the girls and
24 things like that. The girls kept trying to kill
25 theirselves (sic) or whatever, just so they could

1 go to the hole and see the boys and all of that.

2 So they moved all of us.

3 Q So they moved all of the girls?

4 A Yes. They moved all of the girls.

5 Q Okay. And then you were released from
6 Southern Plains. What did you do after that?

7 A Oh, went back to court, signed my
8 papers, went home.

9 Q Okay. And when you went home, did
10 you --

11 MS. NAIK: Devan, I have a quick
12 question. Would it be possible to get on the
13 record Sharonica's age when she's at all of
14 these various places?

15 It's just been a little confusing.

16 MR. PEDERSON: Yeah. Sure. That's a
17 good point.

18 Q (By Mr. Pederson) What age were you when
19 you first went to COJC?

20 A 16.

21 Q And then --

22 A I was 15 when the case happened, but I
23 was 16 when they shipped me from Craig County
24 Detention Center to COJC.

25 Q And Craig County Detention Center, what

1 kind of facility was that?

2 A Like a holding facility.

3 Q How long were you there?

4 A From April until September.

5 Q Okay. So --

6 A No. No. No. From April to August.

7 Q Okay.

8 A From April to August.

9 Q And then you went straight from there to
10 COJC when you were 16; is that right?

11 A Yes, sir. I had a birthday while I was
12 staying in Craig County.

13 Q And then you stayed at COJC until you
14 were how old?

15 A 18.5.

16 Q And then you went to Southern Plains
17 when you were how old?

18 A That was still in the same -- okay. So
19 I was at COJC, and then I got shipped. We got
20 shipped to Southern Plains around the end of my
21 sentence. So I was -- yeah. I was -- I had
22 already turned 18 at COJC. So I was 18 at
23 Southern Plains as well.

24 Q And then when you got out of Southern
25 Plains, you went home. And home would have been

1 where at that time?

2 A Tulsa, Oklahoma.

3 Q Do you remember the address?

4 A No.

5 Q Do you remember the -- was it an
6 apartment?

7 A Yeah.

8 Q Do you remember the name of the
9 apartment?

10 A Mohawk. Mohawk Manor Apartments.

11 Q Who lived there with you?

12 A My mom and my siblings.

13 Q How long did you stay at Mohawk Manor?

14 A Until I got locked up again, I was still
15 staying out there.

16 Q What is your recollection of how long
17 that would have been?

18 You get out of Southern Plains, and
19 you're in Mohawk Manor for about how many months
20 did you say or years?

21 A Probably about, like, six months, seven
22 months at the most.

23 Q Okay. And then you said you got locked
24 up. What happened?

25 A I got another case in Tulsa.

1 Q Did they take you to the Tulsa County
2 Jail?

3 A Yes, sir.

4 Q About how long were you there?

5 A From, I think, either May -- yeah. From
6 May until about -- from May to August.

7 Q In that time between going to Tulsa
8 County and the time you left Southern Plains,
9 what were you doing from day-to-day? Did you
10 have a job?

11 A No, sir. I was trying to find a job,
12 but I couldn't find a job because of my
13 background history. I always had warrants or
14 things like that, even still to this day.

15 Q You said you were looking for a job.
16 Where all did you look, if you recall?

17 A Everywhere. I started out with food
18 places because I didn't have no experience in --

19 Q I'm sorry. Where?

20 A Food places.

21 Q Oh. Food places. Okay.

22 A Yes, sir.

23 Q Do you remember any that you applied
24 for?

25 A No, sir.

1 Q Do you remember any other particular
2 employers that you sought employment with during
3 the time you lived at Mohawk Manor?

4 A No, sir.

5 Q How many places do you think you applied
6 to while you were at Mohawk Manor?

7 A Over a dozen.

8 Q Did you get any offers at all?

9 A No, sir. They all told me that I was
10 too young, and my background history wasn't up
11 to par, and sometimes they even said I had
12 warrants, but -- and that's all that I would get
13 or was getting at the time.

14 Q Did they specify anything else about
15 your background? Too young and anything else
16 you can remember?

17 A No, sir. That's always what it was. I
18 was too young or my background or I had
19 warrants.

20 Q What was it about your background, if
21 you know?

22 A The Washington County situation.

23 Q The youthful offender case?

24 A Yes, sir.

25 Q Do you remember who might have told you

1 something about you having warrants that stood
2 in the way of your employment at that time?

3 A The hiring manager. I just went through
4 this down here.

5 Q The hiring manager where?

6 A I don't remember. Like, I don't
7 remember all of where I put in applications at,
8 but every time I got a call back, that's what it
9 was.

10 Q Did you look into those warrants, or
11 what did you do to fix that, if you recall?

12 A Tried to get a job. I just kept trying
13 to get a job. I paid when I could. If I had a
14 little, I still paid. I was trying to get a
15 job.

16 Q After you left the Tulsa County jail,
17 where did you go?

18 A Mabel Bassett Correctional Center.

19 Q How old were you at Mabel Bassett?

20 A Whew. From the age of -- up until 2017.
21 So from 2014 to 2017.

22 Q You've already told us about the work
23 program that you graduated from at Mabel
24 Bassett.

25 Did they have any other kind of training

1 or education for you while you were at Mabel
2 Bassett?

3 A Yeah. They've got college courses, but
4 I ain't got a GED.

5 Q So you didn't take any college courses?

6 A No, sir.

7 Q After you got out of Mabel Bassett,
8 where did you go?

9 A Home.

10 Q Back to Tulsa?

11 A Well, I got out of Mabel Bassett twice.

12 Q Oh, okay.

13 A The first time, I never hit the streets.
14 I got detained, and when I got detained, I had
15 to go back in as a new person.

16 Q So, then, did you just stay at Mabel
17 Bassett?

18 A Yeah.

19 Q Okay.

20 A I discharged it, and Washington County
21 came and walked me right back through the gate.

22 Q When you ultimately got out of Mabel
23 Bassett in 2017, where did you go?

24 A Oklahoma City.

25 Q Who did you live with in Oklahoma City?

1 A Knikko Dennis.

2 Q Who is that?

3 A A friend of mine.

4 Q Do you know how to spell that first
5 name?

6 A Yes. K-n-i-k-k-o.

7 Q Were you able to find any employment
8 when you lived in Oklahoma City?

9 A Yes, sir. I started working for UPS.

10 Q Was that in 2017?

11 A Yes, sir.

12 Q Do you remember what month you got hired
13 by UPS?

14 A I think it was November, because I had
15 just got out October 13th, and I started the
16 beginning of November. It was somewhere around
17 there.

18 Q What did you do for UPS?

19 A Package handling.

20 Q About how many hours did you work a
21 week?

22 A At least about 30, 35.

23 Q Did they provide you with any health
24 insurance?

25 A They was offering it, but I wasn't

1 there, you know.

2 Q Oh, okay. How long did you work for
3 UPS?

4 A From, I think, November to the middle of
5 January, something like that. Seasonal.

6 Q Okay. So the reason you left was what?

7 A It was a seasonal job.

8 Q When you took that job in November, did
9 you understand that it would only go until just
10 after Christmas, I guess?

11 A Yeah. Yes, sir.

12 Q Do you recall how much you were making
13 at UPS?

14 A I think it was like \$11 an hour.

15 Q Did you have any other jobs during the
16 time you worked for UPS?

17 A No, sir.

18 Q After UPS, where did you work?

19 A I couldn't find another job in the City
20 because they started bringing up my warrants and
21 stuff. So I just moved back to Tulsa.

22 Q Who brought up the warrants?

23 A I was trying to get hired by Family
24 Dollar, and they do a background check, and they
25 told me I had an outstanding warrant for a

1 \$100,000 fine in Washington County. And when I
2 called, they said I had to come up there. So I
3 had to leave Oklahoma City.

4 Q So it was somebody at Family Dollar who
5 said that you had an outstanding warrant?

6 A Yes, sir. The hiring manager.

7 Q Do you remember that person's name by
8 any chance?

9 A No, sir.

10 Q Did you look for any other employment in
11 Oklahoma City?

12 A No, sir. I didn't have the time to.
13 I had to move back to Tulsa.

14 Q You applied to Family Dollar, and that's
15 in Oklahoma City?

16 A Yes. It's on -- after Family Dollar
17 told me I had the warrant, I called Washington
18 County, and they said that I had a 300-and-some-
19 dollar warrant and that I had to come and turn
20 myself in.

21 So I had to find a ride from OKC to
22 Tulsa -- I mean, to Bartlesville, and back to
23 OKC where I could get my clothes.

24 Q Do you remember who you talked to in
25 Washington County?

1 A Dana. I don't remember her last name,
2 but she do the fines and court costs.

3 Q So you called based on being told you
4 had a warrant by the Family Dollar manager; is
5 that right?

6 A Yes, sir.

7 Q And then you called, and you talked to
8 Dana, and she said what, exactly, to the best
9 you can remember?

10 A Yes, sir. She told me I had a warrant
11 and that I needed to come turn myself in.

12 I said, "Well, I can come pay you guys
13 when I get a ride."

14 Because it was the weekend. So I had to
15 wait until that Monday to go down there and pay,
16 to get them to take care of the warrant.

17 Q Do you remember what month that was?

18 A Not right off bat.

19 Q Sometime in early 2018, maybe, or do you
20 not remember?

21 A I'm trying to -- hold on. I can't
22 remember at this moment.

23 Q At that time when you called Washington
24 County, had you ever made any payments?

25 A Yes, sir. I was making them. I was

1 making payments all the time. And I kept my
2 receipts. I had -- well, at that time, I was
3 keeping money order receipts. But I was paying
4 them and Tulsa County. So I was sending out
5 \$100 every month.

6 Q Was that \$50 to Tulsa and \$50 to
7 Washington County?

8 A No, sir. \$75 to Washington County and
9 \$25 to Tulsa County.

10 Q You got a ride. Who did you get a ride
11 with to go back to Bartlesville?

12 A From Madison Gilridge, the DOC nurse.

13 Q How did you know Ms. Gilridge?

14 A She worked on Mabel Bassett yard, and
15 she took me in after I -- because I had moved
16 out with Knikko Dennis.

17 Q Because what?

18 A I moved out. I had moved out. Like, I
19 was with Knikko probably, like, a month and a
20 half -- well, almost one or two months, and then
21 I moved out with her because the DOC nurse had
22 told me I could come live with her.

23 Q How long did you live with Ms. Gilridge?

24 A Until about April or May. May.

25 Q Of 2018?

1 A Yes, sir.

2 Q Did you ever talk to Ms. Gilridge about
3 your warrants other than when you asked for the
4 ride to go to Bartlesville?

5 A Yes, sir. She made sure I sent out all
6 my money and everything. She made sure. She
7 was on it.

8 Q Where were you getting that money that
9 you were paying them, to Tulsa and --

10 A I still had money saved up from UPS. We
11 got paid every week, every Friday. So the money
12 that -- I paid Bartlesville their \$75, and I
13 paid Tulsa their \$25, and I would just do that
14 every month. Sometimes I even paid more to
15 Washington County because of the warrants.

16 Where the warrants come from, I don't
17 know if I'm paying. So I don't know.

18 Q When you called the court clerk, did
19 they explain why you had the warrant?

20 A No. She just told me that I needed to
21 come in to see the judge. And when I got down
22 there to see the judge, she was like, "No. You
23 don't have to see the judge. No one told you
24 that."

25 I'm like, "That's what they told me; I

1 had to come down here to see the judge in order
2 to get my warrant lifted."

3 "No. We just need you to pay your
4 money."

5 So I paid the 300-and-some dollars, and
6 I asked her was I current on my fines.

7 And she said, "No."

8 I said, "How am I not current on my
9 fines when I've been sending you all money every
10 month, every month, on time?"

11 **Q And what did she say?**

12 A She said, "We can go all day about
13 this."

14 And that's when their sheriff, Sheriff
15 Fuller, he looked at me, and he said, "You still
16 dealing with this same case since you was a kid.
17 Just walk out of the courtroom because they're
18 going to try to hold you in contempt," and I
19 left.

20 **Q Were you talking to a judge? Did you**
21 **talk to a judge or talk to the court clerk, or**
22 **do you remember?**

23 A I was talking to the people that process
24 the payment plans. I was talking to them, and
25 she started -- like, when you first walk in to

1 Washington County, you go through the metal
2 detector, and then it's a glass -- the glass
3 thing right there.

4 **Q Right.**

5 A Yeah. So I had to go up there and pay
6 my money.

7 And we was talking right there, but the
8 sheriff was sitting off to the side, by the
9 metal detector.

10 I said, "You all told me I had to come
11 down here to see the judge to get my warrants
12 cleared up. Now you all are telling me
13 something else."

14 He's like, "Just pay your money and get
15 up out of here because they're going to hold you
16 in contempt."

17 So I had to leave.

18 **Q Okay. So you weren't in a courtroom**
19 **like where the judge is? You were at that front**
20 **glass there?**

21 A Yes, sir.

22 **Q Okay. And so you paid. Do you remember**
23 **how much?**

24 A I think it was like \$330.

25 **Q Do you know if they recalled that**

1 warrant at that point?

2 A Yeah, they recalled it.

3 Q You've never actually had to -- they've
4 never actually arrested you on one of those
5 Washington County warrants, have they, for fines
6 and costs?

7 A Yes, sir. I was told to come down one
8 day by DeLapp, Judge DeLapp. He was going to
9 wait for me until 5:00. I think that's when the
10 ice storm was happening. But he was going to
11 wait on me until 5:00.

12 And when I made it up there, someone
13 else was -- it was me and two other people --
14 well, it was me and another person. They was
15 speaking to him, and he asked her, "Why didn't
16 you pay your fines and all this?"

17 She said, "I have no money."

18 He just said, "All right. We'll set up
19 you a payment plan."

20 Well, when I stood up, it was,
21 "Ms. Carter, do you have your money?"

22 I said, "No, sir."

23 "Bailiff, take her." And I went to
24 jail.

25 Q Do you know when that was with Judge

1 DeLapp?

2 A I think it was either February or
3 January.

4 Q Of what year?

5 A I don't remember what year.

6 Q How long were you in jail after that?

7 A I would probably say almost 30 minutes
8 to an hour.

9 Q Why did they let you out after 30
10 minutes to an hour?

11 A Because my mom had to scrape up some
12 money to come pay.

13 Q Do you know how much your mom paid?

14 A I think it was like \$150, almost \$200.

15 Q Did they walk you back to the jail and
16 book you in? Did they handcuff you?

17 A Yes, sir. I went in the police car and
18 everything.

19 Q Okay.

20 A I was stripped out, take my shoe
21 strings, all that.

22 Q So, then, in 30 minutes or an hour, you
23 were out. Did they give you a time to come
24 back?

25 A Not that I recall. No. Not that I can

1 recall.

2 Q Is it possible that they gave you a time
3 to come back? You don't remember, or you're
4 pretty sure they did not?

5 A No, sir. Because I left from the
6 county, from Washington County, and I went home.
7 I didn't go back to the courthouse or anything.

8 Q But I mean did they give you a future
9 date when you were supposed to come back to
10 court?

11 A I didn't get anything. I was in -- as
12 soon as I walked in the courtroom, he finished
13 with her, got to me, asked me did I have the
14 money.

15 I said, "No."

16 He said, "Bailiff take her."

17 I didn't get no papers. I didn't get
18 nothing.

19 Q Did Judge DeLapp say anything else to
20 you? Did he ask you why you hadn't paid or why
21 you hadn't appeared or any questions like that?

22 A I told him I couldn't find no job.

23 And he said, "Well that's tough."

24 Like, he was always short with me,

25 "That's tough," or "Good luck," or things like

1 that.

2 I never really got the chance to speak
3 to him. It was always through my attorney, and
4 he was talking back to her, and every time I
5 tried to say something to add, I couldn't say
6 anything.

7 Q Did you have an attorney, Kristi --

8 A Yes, sir. Kristi Sanders.

9 Q -- Kristi Sanders?

10 Was she there when you saw Judge DeLapp
11 and you had to go to jail for 30 minutes to an
12 hour?

13 A No. It was just me, him, my mother, and
14 the bailiff. That was it.

15 Q Is that the only time you have been
16 arrested on a fines and costs warrant, to your
17 knowledge?

18 A No, sir. I was fixing to get arrested,
19 I think it was, almost two years ago when
20 Stigler (sic) -- I don't know his name. He told
21 me to come and have \$50 by 3:00, and I already
22 knew what that meant.

23 Q Okay.

24 A And I had just told him I couldn't pay.

25 Q So what did you do?

1 A My auntie paid. My auntie and my
2 grandmother paid. I didn't have no money.

3 Q What month and year do you think that
4 was?

5 A I know it was -- I think 2018, end of
6 2019, something like that. Something like that,
7 2018, 2019. But I think that it had to be the
8 end of the -- yeah. Close to the end of 2018.

9 Q Why were you in court that day?

10 A I was in court that day because I think
11 I had a warrant for my arrest again.

12 Q How did you find that out?

13 A I called to see if I was current on my
14 fines, and they told me that I had a warrant and
15 that I needed to come in.

16 I said, "All right. I'll be up."

17 Q So you came in, and just step me through
18 it with as much detail as you can.

19 A Okay. When I came in, I went upstairs.
20 I forgot what floor I went to. It was either
21 the second or third floor. I went upstairs.
22 There was a lot of people in the courtroom. So
23 I had to sit and wait on them to call my name.

24 When they called my name, I went up
25 there, and they said -- he asked me -- he said,

1 "Do you have your fine money?"

2 And I said, "No, sir."

3 He said, "Well, you need to have it by
4 3:00," and he went to the next person, and that
5 was it.

6 **Q They didn't put the handcuffs on you or**
7 **anything like that, did they?**

8 A No, sir, not that time. He just told me
9 to go -- I've got until 3:00 to come up with
10 \$50.

11 **Q Did someone pay that \$50 by 3:00?**

12 A Yeah. My grandma.

13 **Q So you didn't go to jail that day?**

14 A No, sir.

15 **Q Is it fair to say you were not arrested**
16 **at that time?**

17 A No, sir.

18 **Q Is that right?**

19 A On the verge, yes, but no. Did it
20 actually take place? No.

21 **Q Any other times did you get arrested on**
22 **a fines and costs warrant that you know of?**

23 A Well, Tulsa County, they pulled me over
24 probably like five or six times and told me that
25 I had a \$100,000 warrant.

1 And I'm like, "I just got out of the
2 penitentiary for that. It should still be up
3 there.

4 And they would call Washington County,
5 and Washington County would say -- no -- yeah.
6 They'd call Washington County, and they would
7 say, "Just let it go. She have to come to court
8 and pay."

9 That was it. It was always money.

10 Q Okay. So you weren't arrested that
11 time?

12 A No. I was detained.

13 Q What law enforcement agency stopped you?

14 A Tulsa.

15 Q Tulsa?

16 A Tulsa police.

17 Q Tulsa Police Department.

18 Do you know why you were stopped?

19 A No. That was just -- they just said
20 that they was looking for guns and stuff like
21 that.

22 I didn't have nothing.

23 Q Were you driving?

24 A No, sir. I was a back passenger.

25 Q So they pulled the car over that you

1 were in? They pulled the car over?

2 A Yes, sir.

3 Q And they said they were looking for guns
4 or something like that?

5 A Yeah. They weren't looking for anything
6 else except for guns, and then they asked us all
7 our name, and they asked me for my ID. I gave
8 him my ID.

9 He came back to the car and said, "Put
10 your hands behind your back. You've got a
11 \$100,000 warrant. I don't know if it's a
12 mix-up. I don't know if it's messed up, but
13 we're going to call" --

14 He told my sister and them -- he said,
15 "Just don't pull off yet," he said, "Because we
16 need to get this cleared because I keep seeing
17 this."

18 So he called, and they called and told
19 him to let me go and that it was a mistake.

20 Q How long were you detained back then?

21 A 30 minutes. I was sitting in the car
22 for about 30 minutes.

23 Q Was anybody else in the car arrested?

24 A No, sir.

25 Q They let you all go after that?

1 A Yes, sir.

2 Q Any other times you were arrested based
3 on a fines and costs warrant from Washington
4 County that you know of?

5 A No, sir.

6 MS. NAIK: Devan, would it be okay if we
7 took a few minutes? We've been going for about
8 an hour.

9 MR. PEDERSON: You bet. Yeah. Let's
10 take a break.

11 How long do you want to take?

12 MS. NAIK: Sharonica, what will work for
13 you? Five minutes?

14 THE WITNESS: It don't matter.
15 Whichever is clever. I'm here.

16 MS. NAIK: Okay. Sounds good.

17 Can we take five minutes?

18 MR. PEDERSON: Yeah. You bet.

19 MS. NAIK: Okay.

20 (Break from 11:08 a.m. 11:26 a.m.)

21 MR. PEDERSON: Back on the record.

22 Q (By Mr. Pederson) Remind me. Where did
23 you meet Ms. Gilridge?

24 A Mabel Bassett. She was a nurse on the
25 yard. She was a DOC nurse at Mabel Bassett.

1 Q After you left Mabel Bassett, how did
2 you get in contact with Ms. Gilridge?

3 A Ms. Gilridge, her boyfriend at the time,
4 Derrick Smith, and Steven Koonce, they all was
5 -- well, Steven Koonce and Derrick Smith, they
6 was the DOC guards, the COs, and Gilridge was
7 Derrick's girlfriend. So that's how I met them.
8 That's how I met her.

9 Q After you left the facility, though,
10 when is the first time you talked with any of
11 the DOC employees or Ms. Gilridge?

12 A Frequently. Okay. It was frequent
13 because I was trying to -- like, trying to find
14 me an attorney for my case and things like that.
15 So I talked to them a lot.

16 Q You had their phone numbers and all
17 that?

18 A I can get them.

19 Q Well, I mean, I'm just wondering. You
20 had them at the time; right?

21 A Yes, sir. I had them at the time. Yes,
22 sir.

23 Q Were you friends with them while you
24 were in Mabel Bassett?

25 A No, sir.

1 Q Only afterwards?

2 A Yes, sir.

3 Q Did they initiate contact with you
4 once you were out of Mabel Bassett, or did you
5 initiate contact with them, or how did that
6 work?

7 A No. They called me and asked me how I
8 was doing.

9 Q Which one called you?

10 A All of them. Steven Koonce, Madison
11 Gilridge, and Derrick Smith. All three called
12 me.

13 Q Do you know why they called you, or do
14 you know what the reason was?

15 A Okay. Before I got released, Steven
16 Koonce -- he asked me why was I still in Mabel
17 Bassett, and I said, "I don't know. I'm just
18 waiting to go home."

19 So he looked at my case and said, "You
20 are not supposed to be here at all."

21 And that's how they came in with that.

22 Q Was Mr. Koonce a correctional officer or
23 a --

24 A He's a correctional officer, military,
25 and -- well, now he do law enforcement for OKC.

1 Q Is he with the Oklahoma City Police
2 Department?

3 A Yes. He's in the academy right now.

4 Q So while you were in Mabel Bassett,
5 Mr. Koonce checked on your file and said,
6 "You're not supposed to be in here"?

7 A Yes, sir.

8 Q And then how long after that did you get
9 released?

10 A I went through the parole process. The
11 probation and parole lady -- she told me --
12 well, she actually closed the door and said, "If
13 I was you, I wouldn't sign." She was like,
14 "Just stay here and finish the rest of your time
15 because you're not supposed to be in here."

16 When Washington County brought me back
17 from Washington County, they brought me in
18 intake. They told me -- well, they pulled me to
19 the side and said I was going to go home because
20 I wasn't supposed to be here. Then they said --
21 they was trying to figure out if I had 90 days
22 left or things like that.

23 Then they said just -- just -- "We're
24 going to intake you on the yard and put you in
25 as a new person because we don't know why you're

1 here."

2 I think they was trying to contact
3 Washington County until about 6:00 that night to
4 see why was I back on the yard and had just
5 discharged, and it just went from there.

6 Q Did they ever tell you how that turned
7 out or what they heard?

8 A No. They just -- they just -- every
9 time they seen me, like, "You know you're not
10 supposed to be here, man. Stay out the way."

11 Q Do you think there was -- what's your
12 understanding of what the basis of their
13 thinking you weren't supposed to be there was?

14 A Yes, sir. Because I had already -- what
15 I signed for was 18 months nonviolent, and I did
16 flat time. I wasn't in any trouble.

17 I mean, I got into a -- I wasn't perfect
18 on the yard. I would say I probably had, like,
19 two write-ups, but other than that, I didn't get
20 in no trouble. I stayed on my level, Level 4,
21 all of that.

22 My write-ups on the yard was for smoking
23 cigarettes, and that was it. Nothing major.

24 Q Okay. So you get out of Mabel Bassett,
25 and Mr. Koonce calls you?

1 A Yeah. All of them did.

2 Q All of them did. And they just said
3 they were just checking on you?

4 A Yes, sir.

5 Q Did that seem unusual to you, or did
6 that strike you as awkward?

7 A No. It wasn't unusual to me because,
8 like -- okay. I didn't get visitors or anything
9 like that, you know. Not that I couldn't get
10 them. I just didn't want them, you know, as far
11 as -- my family moved to Louisiana. You know
12 what I'm saying? So I was eight hours, almost
13 nine, 10 hours apart.

14 So they was just, you know, like,
15 "You're the only person that don't have
16 visitors. Are you all right?"

17 "Yes, sir. I'm okay."

18 "Are you fine?"

19 "Yes, sir."

20 You know, that's all it was.

21 Q Okay. And so --

22 A I moved in with Gilridge after the UPS
23 job was done because I couldn't find another
24 job. So she just told me to come stay with her.
25 She helped me look for a job.

1 Q She gave you a ride to Bartlesville.

2 You've told us about that.

3 A Yes, sir.

4 Q And then after that, where did you --
5 where did you live after that time when you went
6 to court when Ms. Gilridge gave you a ride?

7 A I went back with her, like -- but I had
8 to just, like, go back and get my clothes and
9 things.

10 She didn't boot me out or anything. I
11 just -- I can't keep -- I couldn't keep finding
12 rides from OKC to Bartlesville. So I just moved
13 back to Tulsa with my sister.

14 Q Okay. So you moved back to Tulsa.
15 What's your recollection about when that was?

16 A I think like -- well, no. I know, like,
17 the end of May.

18 Q And what sister was that?

19 A Akilia.

20 Q How long did you live with Akilia?

21 A I lived with Akilia from the end of
22 May to about October. And then my sister,
23 Kamareanna, had got an apartment. So I stayed
24 with her from October until -- from October
25 until, say, around about February -- no. From,

1 like -- okay. From, like, May -- no. From,
2 like, October -- so from October until I would
3 say around March, and then I moved back with
4 Akilia.

5 Q Okay. And then after you moved back
6 with Akilia, how long did you stay there?

7 A Until about November of 2019.

8 Q So from the time you moved back to Tulsa
9 to November 2019, did you find a job anywhere?

10 A Yes, sir. I was working for AZZ Steel
11 Galvanizing. I worked with Janet's Meats and
12 Entrees. I worked for AAON Heat and Air
13 Company. I worked for Taco Bell, Parker
14 Plastics. Most of them was temp jobs, though,
15 except for AAON and AZZ Steel Galvanizing.

16 Q Okay. I'm sorry. Could you tell me
17 that first one again? Let me try to -- I
18 couldn't write that fast.

19 A The steel galvanizing?

20 Q Yes.

21 A AZZ.

22 Q AZZ Steel Galvanizing?

23 A Yes, sir.

24 Q Let me ask you about that. What did you
25 do for them?

1 A I was, like, twisting the wires. So,
2 like, the highway -- like the big poles and
3 things on the highway, we had to strip them, dip
4 them in acid and things like that. So I was,
5 like, hanging them up on the wires and where
6 they go and get dipped.

7 Q How long did you work with AZZ?

8 A For about two and a half months.

9 Q Do you remember your boss' name?

10 A No, sir.

11 Q Do you remember how much you were making
12 there?

13 A Like \$9 or \$10. \$9 or \$10.

14 Q Did you have any kind of training for
15 that job? Did they give you any kind of
16 training or anything like that?

17 A No, sir. They gave you an example of
18 how to hang it up and figure it out.

19 Q When you took that job, was it your
20 understanding that it was just a temporary
21 thing?

22 A No. That was a job job.

23 Q How many hours would you work a week on
24 average there?

25 A Ooh. I was working 12-hour shifts.

1 Yeah.

2 Q Okay.

3 A Yeah. I was working 12-hour shifts.

4 Q So it was, like, 40 hours a week or more
5 than that?

6 A No. I don't think I was getting that
7 many hours.

8 Q Okay.

9 A And, like, on some days, like, when the
10 temperature was, like, in the hundreds, like we
11 couldn't work. So it was too hot, and we're
12 already out there with steel and acid. So they
13 would just tell us, like -- so most of the time,
14 we would work, like, three days out of a week.

15 Q Okay. Three days a week on, like,
16 12-hour shifts?

17 A Yes, sir.

18 Q You said twisting wires. And where did
19 these wires go to?

20 A It was loose wires. You had to twist
21 them, like -- say, for instance, like, the end
22 of a pole, before they put the screws in, the
23 big screws, like a light pole. I would have to
24 put wires through that loop with a -- I would
25 have to put wires where the screws go and hang

1 them up and lock them in. So once they pulled
2 it over -- the crane would go up in the air. It
3 tightens up, and they go and dip them in the
4 acid and things like that.

5 **Q Okay.**

6 A So I was twisting the wire, pretty much
7 crimping.

8 **Q Okay. I gotcha.**

9 **Why did you leave that job?**

10 A It got too hot. I almost had a
11 heatstroke.

12 **Q Did you have to go to the hospital or**
13 **anything like that?**

14 A No. I didn't go to the hospital because
15 I didn't have insurance, so...

16 They told me I was having a mild
17 heatstroke, though. Just to go home.

18 **Q Okay. And then you said, "That's enough**
19 **for me. I'm not doing that job anymore"?**

20 A No. They just, like, asked me, like, if
21 I was fine and everything.

22 I'm, like, "It's just -- it's hot."

23 Well, "We could get you another
24 position."

25 And I tried -- I did that for -- they

1 just had, like -- it was more like man work. I
2 was a female. So that's all it was.

3 Q What was the other position they were
4 going to try to get you in?

5 A To where I'm inside with AC, like --
6 like in -- I forget what it's called. An
7 assistant or something, like, to do the desk
8 work.

9 Q Did you try that at all?

10 A Yeah. But they said they didn't have
11 another opening for me.

12 And I'm like, "I can't keep getting
13 switched around on all your training."

14 So I just -- I went to AZZ -- I mean, I
15 went to AAON.

16 Q How many days did you do the desk work
17 at AZZ?

18 A One day.

19 Q Oh, one day?

20 A Yes, sir.

21 Q Okay. And then they wanted you to do
22 something different?

23 A Yeah. They pretty much wanted me to go
24 back in the heat.

25 Q Oh, okay. So you left that job on your

1 own. They didn't ask you to leave or anything?

2 They were trying to keep you?

3 A Yeah, they was trying to keep me.

4 Q Okay. And then the next job you went to
5 was what?

6 A My -- my -- I left because it was hot,
7 and my checks wasn't right. Like, some of the
8 hours and stuff would be missing on there. So
9 that's why I left AZZ.

10 Q Did you bring that up with them?

11 A Yes. They said they would fix it, and
12 they never did, so...

13 When they put me up there for the desk
14 work and all that and tried to put me back
15 outside, I just said, "You all can have it."

16 Q Do you remember the names of the folks
17 that you worked with at AZZ?

18 A Sedrick Campbell or Tommy Reece and a
19 few Mexicans. I don't remember their names. I
20 remember one of their names was Juan.

21 Q Were they doing the same kind of work
22 you were doing?

23 A Yes. Except one was on a forklift,
24 lifting up the poles and stuff so that I could
25 hang them on the wire.

1 Q Did you tell me already your boss' name,
2 or you can't remember?

3 A I don't remember all of them. I know
4 Juan. One of the Mexican bosses, I know his
5 name was Juan.

6 Q Okay. And then the next job you went to
7 would have been who?

8 A AAON Heat and Air.

9 Q How do you spell that?

10 A A-A-O-N.

11 Q What did you do for AAON?

12 A Wires. Build fans, wire motors to the
13 fans. Like the big AC units that go into gyms
14 or go inside to buildings, I wired those and put
15 them together.

16 Q How long did you work for AAON?

17 A It was like a temp job. It was a real
18 job, but it was, like, more like seasonal.

19 Q How many months did you work there?

20 A Probably a month and a half.

21 Q Do you remember how much you were
22 getting paid?

23 A I think it was \$10 or \$11. I'm not
24 quite sure.

25 Q About how many hours a week were you

1 **working?**

2 A 12-hour shifts.

3 **Q How many days a week would that be?**

4 A Four, five, sometimes six.

5 **Q Do you recall your boss' name there?**

6 A It's like a tribal name, Indian name. I
7 don't remember right off bat.

8 **Q Why did you leave that job?**

9 A It was seasonal.

10 **Q Where did you go to after them?**

11 A Janet's Meats and Entrees.

12 **Q Are all these places you've talked about**
13 **recently in Tulsa?**

14 A Uh-huh.

15 **Q What did you do for -- did you say**
16 **Janet's Meats and Entrees?**

17 A Yes, sir. I was assistant butcher, ran
18 the deli, things like that.

19 **Q How long did you work there?**

20 A I was working there before her business
21 opened and after. So, like, October to
22 February.

23 **Q October to February of?**

24 A '18.

25 **Q How much did you make there?**

1 A Oh, that's a long story. She don't want
2 to pay me like that because I was -- I knew her
3 daughter. So I got one paycheck from there.
4 Yeah. I got one paycheck, and she got closed
5 down. So I really don't know.

6 **Q Why did it close down? Do you know?**

7 A She wasn't like -- I don't know. Like,
8 I don't know. I guess she wasn't doing
9 everything she was supposed to do.

10 **Q Do you remember how much that paycheck**
11 **was, approximately?**

12 A Well, she had wrote me a check for,
13 like, \$300, and I asked her, "Where is the rest
14 of my money?"

15 **Q How much time did you -- you said**
16 **October to February. Okay. Sorry about that.**

17 A It was October '18 to February '19.

18 **Q Okay. Okay. That makes sense.**

19 **And then where did you go after that?**

20 A Taco Bell.

21 **Q How long did you work at Taco Bell?**

22 A From, like, June to -- I don't know.
23 June until October 2019.

24 **Q So June 2019 to October. Okay.**

25 A Yes, sir. To October 2019.

1 Q All right. Do you remember how much you
2 made there?

3 A \$7.25.

4 Q How many hours a week did you work on
5 average?

6 A About 25. I was part-time.

7 Q Did you have any other jobs during that
8 time that you worked at Taco Bell?

9 A I had went and did a temp job. I was
10 there for, like, weeks through Parker Plastic.

11 Q What were you doing for Parker Plastic?

12 A Labeling the bottles -- labeling the
13 bottles, putting them in the machine, putting
14 the handles on the bottles, things like that,
15 like, before they go out to, like, the big --
16 like the Ozark Water companies and all of that.
17 We had to fill, like, up the big gallons. So I
18 was making those gallons. I was making the
19 bottles and labeling them.

20 Q How much were you making there?

21 A I was making \$10. Yeah, it was \$10.

22 Q How long did that job last?

23 A It was only, like, two weeks.

24 Q What did you do after them?

25 A After them I stayed -- well, I was just

1 -- like I said, I worked -- I worked for them a
2 little bit for, like, two weeks while I was
3 working at Taco Bell. So Taco Bell was my last
4 job in Oklahoma, in Tulsa.

5 Q When the Taco Bell job ended in October
6 2019, did you look for other jobs after that?

7 A Yes, sir.

8 Q What kind of places did you look for
9 jobs at after you worked for Taco Bell?

10 A After I worked at Taco Bell, I tried to
11 get a job at Pepsi, but I couldn't.

12 I couldn't get no more jobs in Oklahoma,
13 but I tried. I tried to get a job at Pepsi. I
14 tried to get a job at the hospital, mopping,
15 doing janitorial services. And there was one
16 more. But I never got the jobs.

17 Q Did any of your employers you applied to
18 tell you why you weren't selected?

19 A Yeah. When I went through Express to
20 try to get on, to try to get the job for Pepsi
21 and all that, they told me I had a warrant.

22 Q Do you know what warrant that was?

23 A For the Washington County for the fines.

24 Q How about the hospital? Did they tell
25 you anything about why you weren't selected?

1 A Warrants.

2 Q Do you remember if you had any warrants
3 when you worked for Taco Bell?

4 A I think I did, but the hiring manager
5 was my friend's sister. So she just gave me the
6 job. She said she was going to give me a
7 chance, "Everybody deserves a second chance."
8 So she employed me.

9 Q Do you remember the person at Pepsi who
10 you applied with and told you that you had
11 warrants?

12 A No. It was Express. I guess they sent
13 my application over there to them, and they did
14 a background check, and they said, "We can't
15 take her because she has warrants, open
16 warrants."

17 Q Was that through Express Personnel?

18 A Yes, sir.

19 Q Did you look for employment anyplace
20 else?

21 A Yeah, but I couldn't find none after
22 that. After all that -- well, after the man at
23 Express told me about my warrants and all of
24 that, then Washington County called me again --
25 well, I had court. I had court, and I didn't

1 have no warrant or nothing then, but right after
2 court, I had a warrant for Washington County for
3 my fines and I think failure to appear.

4 Like, they never called me and told me I
5 had a court date. They never told, like -- she
6 said she called a different number, but she
7 never called me.

8 And I've given them up-to-date numbers.
9 I had to give them up-to-date numbers because
10 I had just got released from prison. So
11 everything has to be up to date.

12 **Q Now, what phone number did you have when**
13 **you got released out of prison?**

14 A I had -- oh, I think it was,
15 (405) 550-30-something-78. I don't remember
16 it right off bat. But the number that I have
17 now is (918) 703-9684. And I did gave it to
18 Tulsa County -- I mean, not to Tulsa County. To
19 Washington County.

20 So I don't know why they still have my
21 old number from 2011. This phone is no longer
22 in service.

23 **Q Have you had any other phone numbers**
24 **other than those two since you were released**
25 **from Mabel Bassett?**

1 A No, sir.

2 Q And that number that you have now, when
3 did you get that?

4 A Two years ago.

5 Q When did you give that number to
6 Washington County?

7 A I gave them that number when I went up
8 to go pay my -- when I went to go pay my fines,
9 until Maddie come down there, and I think it was
10 around November 2019.

11 Q So in November 2019, you went to
12 Washington County, and you paid your fines?

13 A Yes, sir.

14 Q Okay.

15 A Because I had a warrant.

16 Q Did they recall the warrant at that
17 time?

18 A Yeah. That's when he told me I had to
19 pay \$50 by 3:00.

20 Q Have you had any jobs since working for
21 Taco Bell?

22 A Yes, sir.

23 Q And what was that?

24 A McDonald's.

25 Q Is that the next job you had after Taco

1 Bell?

2 A I've been working for McDonald's since
3 January of 2020.

4 Q When you started there, how much were
5 you making?

6 A \$7.25.

7 Q Which McDonald's location was that?

8 A Tallulah, Louisiana.

9 Q When did you move away from Tulsa?

10 A The last time I got pulled over. So I
11 got pulled over November 18th. I left the 19th,
12 in fear of my life.

13 Q Okay. So you got pulled over in
14 November. Are you saying November 18th or --

15 A Yes, sir. We had the court hearing in,
16 I think it was, like, October. There was the
17 court hearing for this, the first court hearing.

18 We had that. I didn't have no warrants
19 or nothing then, but then after that, I had
20 warrants, and I got pulled over November 18th,
21 and I left November 19th.

22 Q Okay. So November 19, 2019?

23 A Yes, sir.

24 Q Bear with me one second here.

25 Ms. Carter, I show that on October 21,

1 2019, you came into the courthouse and paid the
2 bond on your warrant, and then you were ordered
3 back for a fines and costs review with Judge
4 Thomas.

5 A Yes, sir.

6 Q He ordered you back on November 1, 2019.
7 Does that sound right to you?

8 A No, sir. That's what I'm saying. I
9 never got another court date. I didn't know I
10 had a warrant out for my arrest and that I had
11 to go to court until after we met in federal
12 court. I didn't know anything.

13 Q When you went to court to pay on October
14 21st, did you talk to -- who did you talk to, if
15 you remember?

16 A They told me I had to come and talk to
17 the judge, but I never made it past them. I
18 made it past the metal detector and to the glass
19 window. That was it.

20 And I said, "You all told me I had to
21 come see the judge."

22 "No. I don't know who possibly could
23 have told you that. You do not have to see the
24 judge. All you have to do is pay the money to
25 get your warrant -- to get your warrant cleared

1 up."

2 I'm like, "But you all -- when I just
3 called you all to try to pay over the phone, you
4 all wouldn't allow me, but now that I'm here,
5 you all -- over the phone, you all told me I had
6 to see the judge; I had to come in and see the
7 judge before I left. But now that I'm here, you
8 all are just telling me that I just need my
9 money and go."

10 **Q At that time did you pay \$50?**

11 A No. I think that was the time when my
12 auntie -- my auntie and them had paid for the --
13 I think -- no. Yeah. I paid -- I paid -- I
14 paid -- yeah. I think I paid \$50 that time.

15 It was \$50 or \$75, and then my auntie
16 and them had to turn around and pay another \$50.

17 **Q When you went there in October of 2019**
18 **and paid that \$50, did they give you paperwork?**

19 A They just gave me a receipt. That's
20 when I asked about my other fines, and they was
21 like, "You ain't current."

22 I'm like, "That is crazy. How am I not
23 current?"

24 Yeah. They gave me -- that's all they
25 gave me was the receipt.

1 Q Is it possible that they handed you, at
2 that time, the notice of a new court date?

3 A No, sir. I got -- the only paper I had
4 was a receipt paper.

5 Q And then it looks like on November 1,
6 2019 --

7 MS. NAIK: Kevin, is there a court
8 document that you're reading from that you can
9 show her?

10 MR. PEDERSON: Yeah. Let me just ask
11 her. I'll show her the documents in one second.
12 I just want to see if she recalls this. She
13 said she didn't get a notice.

14 Q (By Mr. Pederson) It looks like
15 11/1/2019 there is a court minute, and it says,
16 "Defendant fails to appear for fine and costs
17 review."

18 Did you know anything about that?

19 A No, sir.

20 Q And then you said you got pulled over on
21 November 19, 2019? Who pulled you over --

22 A 18th.

23 Q Oh, the 18th?

24 A 18th. And I left Oklahoma on November
25 19th.

1 Q Who pulled you over on November 18th?

2 A Tulsa Police Department.

3 Q Why did you get pulled over?

4 A I don't know.

5 Q Were you driving?

6 A No, sir.

7 Q Tell me what happened. Who were you
8 with?

9 A I was with my girlfriend at the moment,
10 Jeree Gill.

11 Q How do you spell that?

12 A J-e-r-e-e Gill, G-i-l-l.

13 Q Okay. And Jeree was driving?

14 A Yes, sir.

15 Q And where were you all going?

16 A To get something to eat.

17 Q And what happened when you got -- just
18 take me through the --

19 A Well, they pulled us over, and when he
20 got out of the car, he laughed and said, "Yeah.
21 We're just looking for guns."

22 He said, "Every time I see you" -- no.
23 He -- yeah. He said, "We're just looking for
24 guns."

25 And then he said, pretty much, like,

1 every time he's on duty, they always pulled me
2 over. He always seen me, somebody pulling me
3 over.

4 Q Was this the same police officer --

5 A Yes, sir.

6 Q -- who pulled you over frequently?

7 A Yeah. He pulled -- he pulled me -- I
8 know he pulled me over -- since this has been
9 going on, he pulled me over, like, twice.

10 And then he said every time he seen me
11 that they pulling me -- like, somebody -- every
12 time he's on patrol, somebody got me pulled
13 over, like my name popped across their screen
14 and stuff.

15 Q Okay. So at this November 18, 2019,
16 traffic stop, Jeree gets pulled over, and the
17 officer comes to the car and says what?

18 A "We're just looking for guns."

19 And then he saw me and said, "Oh, Ms.
20 Carter, you again."

21 And I said, "Yeah."

22 So I left the very next day in fear of
23 my life.

24 Q And did he arrest you or --

25 A No. He just pulled me over. Like, he

1 just knew it was me. Offered small talk. I
2 don't know.

3 Q Do you know whether he knew you were in
4 the vehicle before he made the traffic stop?

5 A I honestly felt I was getting followed
6 down there.

7 Q So he said, "Ms. Carter, you again."
8 And then what happened?

9 A He laughed and said, "I'm just looking
10 for guns. You guys ain't got no guns?"

11 He said, "Do you mind if we search the
12 car?"

13 "No."

14 "They ain't find no guns. You're free
15 to go."

16 Q How long was that stop?

17 A I would say probably 15 minutes at the
18 most. It wasn't even a long stop, how it
19 usually be.

20 Q Did he say anything about the warrant on
21 that November 18th traffic stop?

22 A No, sir.

23 Q Why did that make you fearful, that
24 traffic stop?

25 A Because I kept constantly -- I

1 constantly -- in Tulsa, ever since, like, the --
2 it was ever since this case has been on, you
3 know, the Google and news and all of that, I
4 have been getting pulled over.

5 Q How many times have you been pulled over
6 in Tulsa since you moved back this most recent
7 time?

8 A From the time we had the first
9 appearance in federal court until -- that was in
10 October -- until November, I got pulled over at
11 least five times.

12 Q Was it always the Tulsa Police
13 Department?

14 A One time it was the Tulsa sheriff's, but
15 other than that, it's always been the Tulsa
16 police.

17 Q Did any of those law enforcement
18 officers who pulled you over say anything about
19 this case or about Washington County or anything
20 like that?

21 A They would just say, like, "You know,
22 you need to walk on thin ice," or "Tread
23 lightly, kid," or --

24 Q Who said that?

25 A The Tulsa Police Department.

1 Q What was the context of that comment?
2 What were you guys talking about when they said,
3 "You need to tread on thin ice"?

4 A I had told them, like, "Man, you all
5 just pulled me over. Why you all keep pulling
6 me over, man? I ain't got no warrants, no none
7 of that. So why you all keep pulling me over?"

8 Q In those times you got pulled over,
9 whose vehicle were you in?

10 A Other people's vehicles, but I never was
11 the driver. I was the passenger or the back
12 passenger.

13 Q Do you have any reason to think that the
14 people who pulled you over for any of those five
15 times knew that you were in that vehicle before
16 they made the traffic stop?

17 A Yes, sir. I stayed where the police
18 stayed on 61st and --

19 Q I'm sorry?

20 A I stayed where the police were always
21 at, on 61st and Peoria. That's the "bad side"
22 of Tulsa, I guess.

23 But even with that, like, you have
24 police that come and do drive-throughs through
25 apartment complexes and all that.

1 Q Do you have any --

2 A Every time I got pulled over, it was
3 always the warrant or a laugh or "tread
4 lightly."

5 Q Do you believe that that has anything to
6 do with the Washington County lawsuit?

7 A Yes, sir.

8 Q What do you base that on?

9 A I ain't never got pulled over this many
10 times before. And not only that, they pretty
11 much telling me -- you know what I'm saying? --
12 like, "We watching you. Tread lightly."

13 Q But none of them had said anything about
14 Washington County or --

15 A Yes, sir.

16 Q Well, what did they say about Washington
17 County?

18 A "We can Google your name."

19 And that's how I found my name. When
20 you type in my name on Google, it brings up
21 everything that's going on.

22 Q Okay. So we can Google your name.

23 Anything else you base that on as a
24 reason that you think that you're being pulled
25 over based on this lawsuit?

1 A Besides what he told me, "Tread
2 lightly," or things like that?

3 Like I say, I've never got pulled over
4 -- and I wasn't in any trouble. I haven't been
5 in any trouble in three years. Since released
6 from prison, I haven't been in no trouble, no
7 county, no none of that.

8 It's always pulled over, detained for
9 Washington County, \$100,000 bond. And I
10 remember that \$100,000 bond, because that's what
11 I had when I was 15. That was the bond then.
12 So it ain't no \$100,000 warrant.

13 So every time I got pulled over, it was
14 pretty much I got detained for Washington County
15 for either warrants or failure to pay fines,
16 because it was also extradite, extradite,
17 whatever.

18 **Q None of these times you got pulled over**
19 **did they arrest you or take you to Washington**
20 **County and do anything like that, did they?**

21 **They would always let you go, wouldn't**
22 **they?**

23 A Yeah. They --

24 MR. LACOVARA: Objection.

25 Devan, don't try to spar with her.

1 We've been very patient. You don't need to
2 argue. Her testimony is her testimony. If you
3 have a question...

4 I don't think you should argue with her
5 the way you just did.

6 MR. PEDERSON: Well, she just said
7 something that contradicted what I thought I
8 heard her describe.

9 I thought I heard her say when she was
10 pulled over in the car previously, they always
11 let her go, things that have something to do
12 with this case, but --

13 THE WITNESS: Well, after I got found,
14 well, it was --

15 Q (By Mr. Pederson) Let me ask you. Let
16 me try to ask a simple question, and maybe we
17 can clear it up.

18 In those five times since you moved back
19 to Tulsa when you got pulled over, you've never
20 been arrested and taken to jail any of those
21 times; is that correct?

22 A No, sir. Always pulled over, held to
23 the side so they can call.

24 And I think they called Tulsa County one
25 time, and Tulsa told them, "No. That is

1 absolutely false. She has no warrants, no
2 nothing. Let her go."

3 Q So the question I asked is you've never
4 been arrested and taken to jail any of those
5 five times that you were pulled over since you
6 most recently moved back to Tulsa. Is that
7 right?

8 A Yes, sir.

9 Q Okay. Thank you.

10 Since January of 2020, have you
11 continuously worked at McDonald's?

12 A Yes, sir.

13 Q How much are you making now at
14 McDonald's?

15 A \$7.25.

16 Q How many hours a week do you work there
17 on average?

18 A What? \$25. \$25 to \$30 at the most.

19 Q Are you looking to change your
20 employment or looking for any other job?

21 A I tried to get two recent jobs, one at
22 Arby's and one at a casino, and she told me I
23 had a warrant. So they just told me I had a
24 warrant from Washington County. I've got a
25 warrant as of right now at Washington County.

1 Q All right. And that's what the casino
2 told you?

3 A The casino and Arby's, recently, like
4 within this past month.

5 So, yes, I have a warrant out for my
6 arrest for Washington County. Why, I don't
7 know. They've never tried to contact me or
8 anything.

9 MR. PEDERSON: If we can, can we take
10 about a -- do you want to do 30 minutes, or do
11 you want to do longer than that? And then we'll
12 try and wrap it up.

13 MS. NAIK: Sharonica, what works for
14 you?

15 THE WITNESS: I'm fine with either one.

16 MS. NAIK: Okay. 30 minutes, that works
17 for me.

18 Is that good with you all?

19 THE WITNESS: Yeah. Yeah. That's good.

20 (Break from 12:18 p.m. to 1:10 p.m.)

21 Q (By Mr. Pederson) Ms. Carter, I just
22 want to ask you about the names of some folks
23 who are listed as possible witnesses in this
24 case.

25 I've got Demetra Carter. That's your

1 mother?

2 A That's my mother.

3 Q Lakendra Carter, that's your sister?

4 A Yes, sir.

5 Q It says that they will be able to
6 testify about matters relating to ability to
7 pay, determinations at sentencing and at the
8 cost docket in Washington County District Court.

9 Let me ask you. Who was with you at the
10 time of your sentencing, if you remember?

11 MS. NAIK: Devan, when you say "it
12 says," are you referring to a particular
13 document that you're reading from?

14 MR. PEDERSON: Yes. It's Plaintiff's
15 Initial Disclosures.

16 MS. NAIK: Okay. Thanks.

17 MR. PEDERSON: Yeah.

18 Q (By Mr. Pederson) Let me ask you,
19 Ms. Carter. Was your mom present at sentencing,
20 if you recall, on your YO case in Washington
21 County?

22 A Yes, sir.

23 Q Was Lakendra Carter there?

24 A Yes, sir.

25 Q Was LeiLani Coble there?

1 A Who?

2 Q Do you know anyone named LeiLani Coble?

3 A No, sir.

4 Q Last name is C-o-b-l-e.

5 A No, sir. I don't know who that is.

6 Q Do you know a Lessie Carter?

7 A Yes. That's my grandmother.

8 Q Okay. Was she present at the time of
9 your sentencing in the YO --

10 A Yes, sir.

11 Q Did she ever come with you to court
12 after your sentencing for any reason?

13 A Yes, sir. She helped pay the \$50 the
14 last go-round, her and my aunt, Margo Carter.

15 Q Is that the time when Judge Sigler had
16 told you you needed to pay \$50 before a certain
17 time in the afternoon?

18 A By 3:00, yes, sir,

19 Q Was Lessie Carter or Margo Carter
20 present when he told you that?

21 A Yes, sir.

22 Q Have you talked to them about that
23 event?

24 A I mean, I did. I did for about a month
25 or two after it happened.

1 Q Did you ask Lessie Carter what she
2 recalled about that event?

3 A Yes, sir. She just said that she --
4 they -- what did they want me to do? Go commit
5 a crime or something to get the \$50 by 3:00?

6 Q Get the \$50 by 3:00. You're just
7 kidding about committing the crime; right?

8 A No. She was asking a serious question,
9 "Do they want you to go out and commit a crime
10 to have the money by 3:00?"

11 And I said --

12 Q Okay. So that's what she said?

13 A Huh?

14 MS. NAIK: Devan, let Sharonica finish
15 the answer.

16 Q (By Mr. Pederson) And about Margo, was
17 she also there when Judge Sigler asked you to
18 pay the \$50?

19 A Yes, sir.

20 Q Have you talked to her about her
21 recollection of that event?

22 A Yes, sir.

23 Q What did she tell you about it, what she
24 remembers about that?

25 A How was I going to get the money if I

1 just told them I just -- if I just told them I
2 didn't have the money, I didn't have \$50, how
3 did they want me to go get it by 3:00? I don't
4 even live down here in Bartlesville.

5 Q I'm trying to show you a few documents
6 here, and we'll see how this works.

7 A Okay.

8 MS. NAIK: Devan, one question before we
9 dive into the docs.

10 Is the universe of documents that you're
11 going to use today the same that you sent us by
12 email a few minutes before the deposition?

13 MR. PEDERSON: Yes.

14 MS. NAIK: Okay. And I noticed that
15 some of those don't have Bates numbers. Have
16 other copies of those been produced, or are you
17 using documents that just haven't been produced
18 yet?

19 MR. PEDERSON: No. I thought they had
20 Bates numbers, but let me look.

21 The only ones I think that don't have
22 Bates numbers may be the ones that came in from
23 third-party subpoenas from the Plaintiff that
24 the Plaintiff has produced from Washington
25 County.

1 MS. NAIK: Okay. And you could just
2 represent that those are complete documents?

3 MR. PEDERSON: Yeah. We can do that as
4 we go here.

5 Q (By Mr. Pederson) Let's see. Okay.
6 Hopefully, you're seeing a document.

7 A I can see it.

8 Q Okay. Let me see if I can make it a
9 little --

10 Can you still see it?

11 A Yes, sir.

12 Q I'll scroll through here a little bit.
13 This is a Plea of Guilty Summary of Facts in
14 your Y011/1 case. It's got a file stamp of
15 August 11, 2011, and September 22, 2011.

16 Do you see that?

17 A Yes, sir.

18 Q Do you remember if you've seen this
19 document before?

20 A Yes, sir.

21 Q It says your lawyer's name is Kristi
22 Sanders.

23 Was that your lawyer at the time of your
24 sentencing?

25 A Yes, sir.

1 Q On 23 it says, "Is there a plea
2 bargain?"

3 Do you see that?

4 A Yes, sir.

5 Q And it's circled, "Yes."

6 Do you recall going over this document
7 with Ms. Sanders?

8 A No, sir. I mean, what I was -- what I
9 recall was me -- was her saying, like, "This is
10 the best deal we've got. Take the deal, or
11 you're going to spend a long time in the
12 penitentiary."

13 Even on some of those answers, I was
14 saying, "No," and it's marked out and put "Yes."

15 MR. LACOVARA: Devan, just to interrupt.

16 MR. PEDERSON: Go ahead.

17 MR. LACOVARA: I just want to put on the
18 record what we said in email which is that Ms.
19 Carter has agreed to waive the attorney-client
20 privilege as to her discussions with her OIDS-
21 supported lawyer back in 2011 and thereafter.

22 We don't necessarily concede the
23 relevance to any testimony, but we're not going
24 to assert Ms. Carter's privilege for the
25 questions you're asking now.

1 I just wanted that clearly on the
2 record.

3 MR. PEDERSON: Okay. Thank you.

4 Q (By Mr. Pederson) So did you say that
5 some of the things were circled one answer and
6 it was different than what you wanted to answer?

7 Don't let me put words in your mouth.

8 A Yes, sir.

9 Q That's what you said. Okay.

10 Let go through this, then. Number 1,
11 "Is the name just read to you your true name?"

12 You said, "Yes." It's got "Sharonica
13 Carter."

14 That one is correct. We marked, "Yes."
15 Is that right?

16 A Uh-huh. Yes.

17 Q Okay. And then, "My lawyer's name is
18 Kristi Sanders."

19 That's correct?

20 A Yes, sir.

21 Q Number 3, "Do you wish to have a record
22 made by court reporter?"

23 That's "Yes."

24 Is that correct?

25 A Yes, sir.

1 Q You don't want to waive the court
2 reporter; is that right?

3 A Yes, sir.

4 Q Your age is 16 and the grade completed in
5 school is ninth; is that correct?

6 A Yes, sir.

7 Q Number 5, "Can you read and understand
8 this form?"

9 It's circled with --

10 A Yes, sir, I can read it, but I told her
11 multiple times I didn't understand.

12 And she said, "Let me put it to you this
13 way." And then still I don't understand.

14 Q Did she try to help you understand what
15 was going on with this document?

16 A No, sir. She pretty much -- you know
17 what I'm saying -- okay. Like when the document
18 came up and I started answering questions, I
19 wasn't circling any of it. She was circling,
20 you know, the "Yes," "No," "True," or "False."
21 She was just reading it off to me, and, like,
22 when she got to the question do I feel that she
23 worked on my behalf, I said "no."

24 Them things like that, I was saying
25 "no," and I don't know how -- yeah. I don't

1 know how some of those -- how my answers
2 switched from what I said or anything. I didn't
3 do any of that.

4 Did I understand? No. When she
5 explained it to me again, I told her, "I still
6 don't understand."

7 And she just said, "Pretty much this is
8 the best deal we got. Take the deal, or you're
9 going to spend a long time in the penitentiary.
10 You're going to grow up in the penitentiary."

11 Q Okay. We'll be focusing more on some of
12 the specifics of that as we go through the form.

13 So on Number 5 there, "Can you read and
14 understand this form," did you tell her to mark
15 "No"?

16 A Yeah. I said, "I can read it, but I
17 don't understand it. The terms, the words, I
18 don't understand any of it."

19 Q Number 6 says, "Are you currently taking
20 any medications or substances which affect your
21 ability to understand these proceedings?"

22 And it's marked, "No."

23 A No.

24 Q Is that a correct answer?

25 A Yes.

1 Q Number 7, "Have you been prescribed any
2 medication you should be taking but aren't?"

3 That's marked "No."

4 Is that a correct answer?

5 A Yes.

6 Q Number 8, "Have you been treated by a
7 doctor or health professional for mental illness
8 or confined in a hospital for mental illness?"

9 That's marked "No."

10 Is that a correct answer?

11 A Do that pertain to the evaluations that
12 I went under?

13 Q I think it's talking more about
14 treatment rather than evaluation.

15 A No.

16 Q Okay. So Number 8 is marked correctly?

17 A Yes.

18 Q Number 9, it says, "Do you understand
19 the nature and consequences of these
20 proceedings?"

21 And you --

22 A And I told her "no."

23 Q You told her "no"?

24 A I told her "no." I didn't understand
25 any of it.

1 Q Number 10, "Have you received a copy of
2 the Information and read its allegations?"

3 It's circled "Yes."

4 Is that a correct response?

5 A Yes. She gave me my copy right after
6 this, right after we filled out the paperwork.

7 Q Okay. Number 11, that's not related to
8 you, but it says, "The State does not move to
9 dismiss any claims."

10 Is that correct, to the best you recall?

11 A I don't recall that one.

12 Q Okay. Number 12, "Do you understand you
13 are charged with attempted robbery with a
14 weapon?"

15 It says, "Yes."

16 A No.

17 Q So you told her to mark "No" on that
18 one?

19 A Yeah. because they, at first, was
20 saying it wasn't -- I think it was what? Just
21 what? Attempted robbery.

22 There wasn't no weapon at first until
23 they -- until it was in court, and they got a
24 gun.

25 Q Did you understand at the time that you

1 went over this document that you were charged
2 with attempted robbery with a weapon?

3 A No. I was under the impression I was
4 charged with attempted robbery.

5 Q Number 13, "Have you previously been
6 convicted of a felony?"

7 And it says, "Yes. Juvenile possession
8 of firearm on school property, Tulsa County."

9 Is that correct?

10 A No. I was never convicted of any of
11 that.

12 Q Okay.

13 A I ain't never been convicted of that.

14 Q What was that?

15 A I said, "No. I never got convicted of
16 that."

17 Q 14, "Do you understand you are subject
18 to the Delayed Sentencing Program for Young
19 Adults and what that sentencing program
20 involves?"

21 A They didn't offer that to me.

22 Q "Do you understand that upon conviction
23 on a plea of guilty to the offense of attempted
24 robbery with a dangerous you will be required to
25 serve a minimum sentence of," and then it talks

1 about 85 percent of --

2 A And I said "no," because they told me it
3 was 33 percent. It wasn't 85.

4 MS. NAIK: Devan, when you're going
5 through these and what the document says, can
6 you note for the record that the document, you
7 know, shows that it was circled "No," and then
8 it was crossed out, and then "Yes" was circled,
9 just so it's clear what the document actually
10 says?

11 MR. PEDERSON: Okay. Yes.

12 Q (By Mr. Pederson) On 14, there's five
13 choices. The first one on 14 is circled "No."
14 On the next one, it's circled "Yes" with "No"
15 marked out, and then "Yes" with "No" marked out
16 again, and then "Yes" with "No" marked out
17 again, and then, finally, "No" is circled on the
18 last one.

19 Is that correct, Ms. Carter?

20 A Yes, sir.

21 Q And you said it was your attorney who
22 filled out this form?

23 A Yes, sir.

24 Q When it's circled "No", like on the
25 second one for Number 14, it's circled "No" at

1 first and then marked out, possibly? Does that
2 look correct?

3 A Yes, sir. I know -- yes. Yes. Yes.

4 Q Do you know how that came to be like
5 that or why it was --

6 A No, sir. No, sir.

7 Q You didn't make any of these markings on
8 this document; is that right?

9 A No, sir. I only signed my name.

10 Q So it's correct you didn't mark on it?
11 You just signed your name, and that's all --

12 A Yes, sir.

13 Q Number 16 says, "Do you understand the
14 range of punishment for the crimes is five years
15 to life and/or a fine of zero to \$10,000?"

16 It's circled "Yes."

17 A Yes, sir. But I didn't know that they
18 was going to -- that that was my fines and fees.
19 I didn't understand that.

20 I understood the five years, but I
21 didn't understand that the fines can be anywhere
22 from zero to \$10,000. I didn't understand it.

23 Q Did you tell Ms. Sanders that you didn't
24 understand that?

25 A Yes, sir.

1 Q What did she say about Number 16, if you
2 recall?

3 A They told me I was going to do 18
4 months. She told me. My crime was at 33
5 percent. It wasn't 85. I was going to do 18
6 months, and I was going to get out.

7 Q Number 17, could you read through that
8 one on your own? You don't need to read it out
9 loud, and then tell me whether that was answered
10 correctly or not.

11 Let me get it back up here for you.

12 A Okay. Okay. I read it.

13 Q The question at the end of that one is,
14 "Do you understand each of these rights?"

15 And "Yes" is circled.

16 Is that correctly answered?

17 A I didn't understand about the blind plea
18 or any of that. When I asked, "What does this
19 mean? I don't understand," she just gave me
20 pretty much the same little summary.

21 "This is the best deal we got. Are you
22 going to take it, or you'll spend most of your
23 years growing up in the penitentiary."

24 I didn't know what no blind plea was, no
25 none of that. When she said no contest, she

1 said I wasn't guilty. That's what she told me.

2 She said, "If you let me do this and I
3 will plead no contest on your behalf, it's
4 saying -- it's pretty much -- I'm pretty much
5 saying that you're not guilty." That's what she
6 told me.

7 Q Did she tell you that on the day you
8 were going over this form or at some earlier
9 time?

10 A Like we would meet up for, like, a split
11 second, and she would have to go into court with
12 somebody else, go into court with somebody else.

13 So it was just a brief moment, "Come
14 here. Let's go over this real quick. Look at
15 the documents. Okay. We'll call you here in a
16 little bit, and we'll go to court." And I would
17 just have to sit back out in the shackles.

18 And then one lady came to the hallway
19 and said that she was my attorney and all that,
20 but my attorney wasn't there.

21 Q Was that on the day of this plea form
22 that we're looking at right now?

23 A Honestly, I don't remember which day it
24 was, but I know that she came in and stated that
25 she was my attorney, and I started talking to

1 her.

2 And then that's when Kristi came in and
3 was like, "Hi, I'm your attorney."

4 And I'm like, "Then, who is this?"

5 **Q Did you ever find out who that person**
6 **was?**

7 A She was working with the DA. I don't
8 remember her name. I remember her by face.

9 **Q What did she look like?**

10 A Caucasian. I think her hair was like a
11 reddish brown, a little bit heavy weight, but
12 not too big.

13 **Q About how old would you say?**

14 A At least mid-thirties.

15 **Q And she came and told you that she was**
16 **your attorney?**

17 A Yes, sir. She presented herself as my
18 attorney and said someone was -- I forgot who
19 she said. The reporter or someone was going to
20 be in court. So she had to come and take down
21 my statement.

22 And then, like, literally, right after
23 she stood up, Kristi Sanders walked in and
24 introduced me as she was my attorney.

25 **Q Did you tell that to Ms. Sanders that**

1 **this lady told you she was your attorney?**

2 A Yes, sir, I told Ms. Sanders that. She
3 said she had to see what she can do.

4 I told Ms. Sanders to fingerprint the
5 gun. She said they wasn't allowing it because
6 of my age, and they was just trying to hurry up
7 to get through with the trial because DeLapp was
8 on -- he had -- I think he had murder cases
9 going on in different counties.

10 So pretty much she was telling me, like,
11 they're trying to hurry up with me to get me out
12 of the way. He's got bigger cases. My case was
13 not that bold enough or not that big to have
14 evidence fingerprinted and things like that.

15 **Q Did Ms. Sanders ever tell you anything**
16 **about what she found out about the lady who said**
17 **she was your attorney who wasn't?**

18 A No, sir. She never got back to me on
19 that. And I just started seeing the lady appear
20 against me. I forget how you say it. She was
21 the plaintiff or defendant, I guess. I don't
22 know.

23 **Q This event with this lady who said she**
24 **was your attorney, did that happen before or**
25 **after your sentencing in the YO case?**

1 A It happened before.

2 Q Did she take a statement from you, the
3 person who said she was your attorney but you --

4 A Yes, sir.

5 Q What did she ask you about?

6 A Asking me about what happened, the
7 crime.

8 Q And did you tell her?

9 A And I told her the same thing.
10 "Fingerprint the gun. I am innocent."

11 Q Why do you think she worked with the
12 district attorney's office?

13 A Because that's who she was appearing in
14 court with.

15 Q When did you see her appear in court
16 with the district attorney?

17 A Every other time after that. Every time
18 I went back to court, she was with the DA, the
19 district attorney. I think it was -- which at
20 the time was Kevin Buchanan. She was with him
21 every time, bringing him paperwork, sitting on
22 his side, telling him -- like, it was me, my
23 attorney, and then my caseworker.

24 She was (descriptive sound) doing that,
25 you know, saying, "Give them the paperwork," you

1 know, "Ask this, ask that."

2 Q And then back to the document, the plea
3 document. Number 18 says, "Do you understand by
4 entering a plea of guilty or no contest, you're
5 giving up these rights?"

6 A No. I didn't understand her. Like I
7 say, when she told me she was going to put in a
8 plea of no contest, she said that I wasn't
9 guilty. "That means you're not guilty." That's
10 what I was under the impression.

11 Q You were under the impression that by
12 pleading no contest, you were telling the court
13 you were not guilty?

14 A Yes. That's what she kept telling me.
15 That's what Kristi Sanders kept telling me.

16 Q All right. But you understood that you
17 were going to be sentenced based on the plea of
18 no contest?

19 A No, sir. I didn't know -- I didn't know
20 what was going on until what they had signed --
21 gave me a paper and said that I was going to
22 going into OJA custody and was going to be
23 transferred to COJC.

24 Q If you could, look at Number 19, and
25 read that to yourself, and tell me if that one

1 is correctly answered or not.

2 A It was -- apparently, it was -- it's
3 circled "Yes," but if I didn't understand, how
4 can I -- like I say, I never circled any of
5 these. My attorney was circling them. She
6 would try to read it to me in small words
7 because my brain wasn't big enough. So she
8 would put it to me in small words.

9 And I'm like, "No."

10 "Well, Ms. Carter, we have to do
11 something."

12 "Take it to trial." I begged her to
13 take it to trial.

14 She came with this. "This is the best
15 deal you got, or you're going to spend the rest
16 of your life -- 15 years of your life in the
17 penitentiary."

18 I was only 15, 16 at the time, and I
19 would still be locked up for it right now.

20 Q Take a look at Paragraph 23. Do you
21 remember reading over that before?

22 A Reading over --

23 Q Reading over 23, the question and the
24 answers that are written in there?

25 A Yeah, I remember that.

1 Q It says, "What's your understanding" --
2 it says, "There is a plea bargain," and it's
3 circled "Yes."

4 Is that correct? Did you understand
5 there was a plea bargain at that time?

6 A No. I thought I was pleading no
7 contest. I didn't know.

8 Q Then it says, "What is your
9 understanding of the plea bargain?"

10 Then it says, "Juvenile will be
11 processed through the juvenile delinquent system
12 as a youthful offender with periodic reviews.
13 State is requesting a 10-year sentence, and
14 juvenile is requesting a five-year sentence."

15 Do you recall anything about --

16 A No, sir. I thought I was going to be
17 locked up for 18 months; not five years; not 10
18 years; not none of that.

19 That's what was drilled in my head.
20 "You're only going to do 18 months, kid."

21 Q Who told you that?

22 MS. NAIK: Devan, are you going to
23 read the other -- just the other handwriting on
24 there, in addition to what you read just, for
25 completeness?

1 MR. PEDERSON: Yes.

2 Q (By Mr. Pederson) Also written in below
3 that, on Number 23, it says, "Blind plea on
4 length."

5 Do you see that?

6 A Yes.

7 Q Do you remember talking about that with
8 Ms. Sanders at all?

9 A No, sir. That's not even her signature.
10 I don't know whose signature that is.

11 Q Do you know if that was on there when
12 you saw this form?

13 A No, sir, it wasn't.

14 Q And the other writing underneath that,
15 over to the right, "Five-year/1,000/250 VCA
16 costs," do you see that?

17 A Yes, sir.

18 Q Was that on there when you saw the
19 document?

20 A No.

21 Q Did you talk to Ms. Sanders about that?

22 A You say what, sir?

23 Q Did you talk to Ms. Sanders about the
24 last thing we just read?

25 A Not on the -- I remember, like, when I

1 got all the way out of the juvenile system --
2 well, not all the way out of the juvenile system
3 -- out of the penitentiary, when I went back to
4 court, I think it was on October 31, 2013, or
5 2014, one of them, but it wasn't -- my fines was
6 what? In all, it was like -- I think, like,
7 \$1,300, \$1,300. But I didn't know about my
8 fines or anything until after I got out of the
9 -- after I completed my juvenile sentence.

10 Q No one attempted to collect those fines
11 and fees and costs from you while you were in
12 the juvenile system, did they?

13 A No, sir. They just stacked up, and they
14 was even taking their percentage out of my --
15 they call it gains pay for the juveniles. They
16 give you money, and they take a percentage out
17 for your fines in court, your fines and fees.

18 So I've been paying while in the
19 juvenile yard and in Mabel Bassett. They was
20 taking percentages out. Every time I would get
21 money to put on my court standing payment, I was
22 taking some out and sending it to them. So it
23 shouldn't have been still even that.

24 Q Okay.

25 A 30, I told her "no." 29 I told her

1 "no."

2 Q Okay. That's on the plea document we're
3 looking at?

4 A Yes, sir.

5 32, I told her I wanted to make a
6 statement --

7 MS. NAIK: Sharonica, just -- you can
8 answer his questions. That's kind of how this
9 goes. He asks questions, and you answer. But I
10 appreciate that you're being forthcoming about
11 what's on the document.

12 THE WITNESS: Okay. Sorry.

13 Q (By Mr. Pederson) Number 30, it says,
14 "Do you plead guilty or no contest of your own
15 free will and without any coercion or compulsion
16 of any kind?

17 And it says, "Yes."

18 A And I told her "no."

19 Q You told her "no," and --

20 A Yes, sir.

21 Q And then did she say the same thing she
22 had been telling you before, or did she say
23 anything else?

24 A She said, "This is the best thing we
25 have."

1 Q And then on 31 and 32, there are "Nos"
2 marked out and "Yeses" circled.

3 Do you know why the "Nos" are marked out
4 and the "Yeses" are circled?

5 A I had told her, like, when she asked did
6 I feel that she did everything and worked on my
7 behalf, I told her "no." So I don't know where
8 the "Yes" could come from.

9 Like I said, I never once filled this
10 form out. The only thing I did was sign my
11 name.

12 Q Yeah. I think that's a different
13 question. But on, like, 31 and 32, you don't
14 have any recollection of why the "No" is marked
15 out and the "Yes" is circled?

16 A No, sir.

17 Q And then do you see here on 1(B) that
18 we're looking at now on Page 6, "My attorney
19 completed this form and we have gone over the
20 form, and I understand its contents and agree
21 with the answers. See Addendum A."

22 Did you go over that one with
23 Ms. Sanders?

24 A Not that I recall.

25 Q It says on 2, "The answers are true and

1 correct."

2 And then on 3 it says, "I understand
3 that I may be prosecuted for perjury if I have
4 made false statements to this Court."

5 Is that your signature just above
6 "Defendant"?

7 A Yes, sir. That's the only thing that I
8 marked on with a pen. All the other stuff, I
9 did not have no authority over the paper. It
10 was just reading the questions off to me and
11 answering them. That's all it was.

12 Q So what you wanted to do was to go to
13 trial on this case?

14 A Yes, sir. I wanted to go to trial and
15 have the gun fingerprinted.

16 Q At the time you were sentenced, you were
17 in OJA custody; is that right?

18 A Yes, sir.

19 Q And you were at COJC at that time?

20 A Yes, sir -- no. I was at Craig County
21 Detention Center.

22 Q Okay. That's right.

23 A I didn't go to COJC until after
24 sentencing was done.

25 Q Okay. That's right. That's right.

1 So you were sentenced in this case,
2 based on this document we've just seen. And
3 then how long after that did you go to COJC?

4 A Oh, I think I went to COJC like -- I
5 would say, like, two -- two or three weeks
6 later.

7 Q And you weren't released prior to that?

8 A No, sir.

9 Q You had remained in custody from the
10 time you were sentenced through the time you
11 went to COJC?

12 A I was in custody from the night it
13 happened up until 2013, October, when I got out.
14 I never hit the streets again.

15 Q Do you see Attachment A to the plea
16 form?

17 A Yes, sir.

18 Q It talks about court costs \$922, fines
19 \$1,000, VCA \$250, et cetera, and then it goes on
20 to spell out additional fees.

21 Did you talk about fines and fees with
22 Ms. Sanders?

23 A One time she told me I was going to have
24 to pay \$1,000 plus the victims compensation.
25 She said altogether it would be like \$1,300, and

1 that was it.

2 Q Okay. Let me show you another document
3 here.

4 A Uh-huh.

5 MR. LACOVARA: Devan, are you going to
6 ask her whether those numbers were filled in at
7 the time she made the plea or not?

8 I saw you looking at the page, and then
9 you went right past it.

10 THE WITNESS: Uh-huh.

11 MR. LACOVARA: It's your record. You
12 certainly don't have to, but it was a sort of
13 odd omission as I watched you go through it.

14 Q (By Mr. Pederson) Let me ask you,
15 Ms. Carter. Let me go ahead and pull that back
16 up.

17 Did you see this Attachment A at the
18 time of your sentencing?

19 A No, sir. No, sir. She just told me my
20 fines was going to be -- I had \$1,000 in fines
21 to pay, and then I had \$250 for the victims
22 compensation, which will round up and be about
23 \$1,300 altogether. That's what I was told.
24 That was it.

25 I ain't never seen none of this. No

1 Tulsa County Sheriff -- I mean, no county
2 sheriffs on none of that.

3 Forensics fee, what was the forensics
4 coming in? When I asked to fingerprint the gun,
5 nobody did that. So I'm not understanding any
6 of that.

7 Q This Attachment A, have you seen this
8 document before today?

9 A No, I have not.

10 Q Okay. Let's see here. I'll be right
11 with you. Hang on.

12 A Uh-huh.

13 Q Okay. Do you see anything on this
14 screen?

15 A Yes.

16 Q It looks like this is a Transcript of
17 Proceedings held on September 22, 2011, before
18 Judge DeLapp.

19 Does that seem to correspond with the
20 date of your sentencing and plea?

21 A I thought I was already at COJC.

22 Q Okay. I'm sorry. If we could mark that
23 original plea agreement we were looking at
24 earlier as Exhibit 1, and we'll mark this
25 transcript as Exhibit 2.

1 Let me just page through this, and you
2 read that to yourself, if you would, and then at
3 the end, I'm going to ask you if that looks like
4 a correct transcription of what occurred.

5 Let me make this smaller here.

6 Can you still see it?

7 A Yes.

8 Q And just let me know when you're ready
9 to move.

10 A You can move.

11 Okay. Okay. Okay. Okay. Okay. Okay.
12 Okay. Okay. Okay.

13 Q The transcript that you just read that
14 we marked as Exhibit 2, did that correspond with
15 your recollection of what happened at that
16 proceeding?

17 A No. I think that's got something to do
18 with the appeal.

19 Q With the what?

20 A With the appeal.

21 Q If I told you that this is a transcript
22 of the proceedings from your sentencing in that
23 YO case, is that possible that that's what this
24 could be?

25 A I mean, you have it right there, I'm

1 guessing.

2 Q Do you remember any of that?

3 A No. Not right off bat, sir.

4 Q When you were reading there, it sounds
5 like they were discussing five years versus 10
6 years and talking about a \$1,000 fine, \$250 VCA.

7 Do you remember any of that?

8 A Well, not in the courtroom. We was in
9 -- it was me and Kristi in that room, and that's
10 when she said, "Kid, your fines are only going
11 to be \$1,000, and you have to pay the victims
12 \$250. So it will round up to about \$1,300."
13 That was it.

14 Q That's what she told you before the --

15 A Yes. She said --
16 Huh?

17 Q That's what she told you before the plea
18 deal?

19 A Yes, sir. So that would have been what
20 we talked about the last time.

21 Q Okay. And then do you remember going to
22 court and the Court saying things like you just
23 read in Exhibit 2, asking questions and talking
24 about the difference between a 10-year sentence
25 and a five-year sentence and fines and things?

1 Do you recall reading that just how?

2 A Yes, sir. But it wasn't no 10 years
3 suspended. It was 15 years incarcerated. It
4 wasn't no suspended sentence.

5 Q Are you saying that this transcript is
6 wrong, or are you saying that the 15-year
7 sentence was -- are you talking about something
8 different?

9 A The 15-year sentence is what my attorney
10 kept saying to me. I didn't know anything about
11 no 10-year suspended sentence or anything.

12 She kept telling me that I was going to
13 prison and pretty much I was going to spend my
14 childhood in prison that I already didn't have
15 now. I did, but they took it. I had a good
16 life at home, all that.

17 Q I think we're on the same page here. Do
18 you see on Page 2?

19 A Yes, sir.

20 Q The Courts says, "Ms. Carter, your
21 mother may be on the way here?

22 "I don't know."

23 "Have you talked to her?"

24 It next says, "SHARONICA CARTER: Yeah.

25 Yes, sir. I just talked to her."

1 The Court says, "Where was she at?"

2 And Sharonica Carter says, "She said,
3 like, coming down the street. She was looking
4 for parking."

5 Does any of that ring a bell, the
6 conversation that you had with the Court?

7 A They asked my mom, oh, because she had
8 to be at every court date. So I don't know
9 which date this is pertaining to.

10 MR. LACOVARA: Kevin, if it's helpful,
11 we're prepared to stipulate that this is an
12 accurate rendition of the on-the-record portion
13 of the allocution. That's fine.

14 MR. PEDERSON: Okay, Counsel. We'll
15 stipulate to that.

16 Q (By Mr. Pederson) What I'm showing you
17 now we will mark as Exhibit 3. It's an Order
18 Granting Time to Pay Fines and Costs and
19 Requiring Appearance for Non Payment. It's file
20 stamped October 17, 2017.

21 Do you see that?

22 A Yes, sir.

23 Q If you would just take a moment to look
24 at that first paragraph there.

25 A Okay.

1 Q It looks like it's setting your payments
2 at \$75 per month on or before 11/17/2017 and \$75
3 on or before the 17th of each month.

4 Do you recall this Order being entered
5 or anything about this particular Order?

6 A Yes. This was after I got out of
7 prison. When I told them I couldn't pay \$75 a
8 month, to work with me, "I'm just getting out.
9 I ain't got no job. I can pay \$25."

10 She said, "No. You've got to pay \$75."

11 Q Who said that?

12 A Dina, Dana, the fines and court costs
13 lady. Dana something, Forbes or -- I don't
14 exactly remember or recall, but I know it's
15 Dana.

16 Q So you were going to see Dana about
17 setting up this payment plan for your fines and
18 costs, and you told her you could pay \$25?

19 A Yes, sir.

20 Q And she said --

21 A No, sir. "You have to pay \$75."

22 I said, "I don't have a job. I'm just
23 getting out."

24 "You still have to pay \$75."

25 Q Is there any other conversation at that

1 time with the fines and costs person?

2 A No. She said, "You've got to pay \$75."

3 Well, when he told me to have my money
4 by 3:00, he told me to go -- to have \$50 by
5 3:00. I did that, and she said she couldn't
6 change my payment plan. Even though I told her
7 I can't afford \$75 a month, she said he didn't
8 tell her to change it. Until she get further
9 notice, then she was not going to change
10 anything. So I had to start back at \$75.

11 Q What did you say when she told you that?

12 A I said, "I don't have a job."

13 She said, "Tough."

14 And I said, "Okay. Yeah. Let me just
15 go on and sign this paper and get up out of
16 here."

17 Q Do you remember what that lady looked
18 like?

19 A Yeah. Caucasian. Dana. Short hair.
20 She wear glasses if I'm not mistaken.

21 Q Do you know about how old she would be?

22 A No, sir.

23 Q What color of hair?

24 A I'm sorry. Will you repeat that?

25 Q What color of hair?

1 A Red or brown.

2 Q Do you see the second paragraph there?

3 It says, "You are ordered to appear for hearing
4 on fines and costs on the 5 day of January 2018,
5 at 1:30 p.m."

6 Were you aware that the order required
7 you to appear for a hearing on fines and costs
8 on January 5th?

9 A If my fines wasn't paid, yes, I had to
10 appear.

11 Q It says, "You do not need to appear."
12 The third paragraph, "If all your fines and
13 costs are paid in full before the hearing date,
14 you must contact the cost administrator for a
15 new court date. Otherwise, you must appear."
16 And it looks like you initialed there.

17 Is that your initial?

18 A Yes, sir. Yes.

19 Q Okay. It has your address. Whose
20 address is that?

21 A That's Knikko Dennis' address. When I
22 got out of the pen, that's where I went, that
23 address right there, in Oklahoma City. That was
24 my cell phone number as well.

25 But you can see, it has "Employer Name."

1 It says "Unemployed."

2 I had no money. I had no way to pay it.

3 Q Okay. I'll show you another document
4 here. Hang on with me.

5 MR. LACOVARA: We've been going about
6 another hour. Ms. Carter, it looks like, might
7 be getting a little tired.

8 If you don't have much more, we'll keep
9 going. Otherwise, we might want to take a short
10 break and stretch our legs.

11 MR. PEDERSON: Okay. Let's --

12 MR. LACOVARA: I feel like you might be
13 getting close to the end, but obviously, it's
14 your nickel, as they say.

15 MR. PEDERSON: If we could take five
16 minutes, that would be good.

17 MR. LACOVARA: Okay.

18 (Break from 2:18 p.m. to 2:32 p.m.)

19 Q (By Mr. Pederson) Let me hand you what
20 I've got pulled up here, Plaintiff Sharonica
21 Carter's Responses and Objections to Defendant
22 Linda Thomas' First Set of Discovery.

23 Do you see that?

24 A Yes.

25 Q Down on Page 12, Response to

1 Interrogatory 8, let me try to get to that. If
2 you could, read where it starts "Interrogatory
3 Number 8," which is going to be a question, and
4 then "Response to Interrogatory Number 8," and
5 then let me know when you're ready to scroll.

6 A Okay. Okay. I'm done reading Number 8.
7 Okay. Okay.

8 Q Do you see where it says, "On September
9 28, 2018, Judge Sigler again signed an Order
10 setting Plaintiff's monthly installment at \$75.
11 At this court date, Plaintiff told Judge Sigler
12 she was unable to pay \$75 a month due to her
13 indigence. In response, Judge Sigler told
14 Plaintiff that unless she paid \$50 before 3:00
15 that day, she would be incarcerated and
16 instructed Plaintiff to set up a new payment
17 plan with the court clerk."

18 Did you see where I was reading?

19 A Yes, sir.

20 Q You previously told us about the time
21 Judge Sigler said you needed to pay \$50 before
22 3:00 p.m.?

23 A Yes, sir.

24 Q What's written here, this is what you
25 were talking about earlier when you told us

1 about that?

2 A Yes, sir.

3 Q And so the date of that would have been
4 September 28, 2018, that that occurred?

5 A Yes, sir.

6 Q Okay. And that, when he told you to pay
7 \$50 before 3:00 p.m., that only happened one
8 time, didn't it?

9 A Yes, with him.

10 Q Okay. With Judge Sigler, that only
11 happened one time. But did it happen with Judge
12 DeLapp?

13 A No, sir. When I -- every time me and
14 DeLapp came face-to-face, it was either, "Do you
15 have the money? If not, you're going to jail.
16 Pack your toothbrush. Good luck," things like
17 that.

18 Q All right. Bear with me a minute. I've
19 got another document for you. I'm almost there.

20 Are you able to see what's on the screen
21 now, which is what we looked at before, the
22 Order Granting Time to Pay Fines and Costs?

23 A Yes, sir.

24 Q Do you see where it says, on the third
25 paragraph, "You don't need to appear if all of

1 your fines and costs are paid in full. Before
2 the hearing date, you must contact the cost
3 administrator for a new court date. Otherwise,
4 you must appear."

5 Do you understand that if you were
6 unable to pay, you had to appear in court?

7 A Yes, sir.

8 Q Okay. You're saying that that was a
9 recurring thing? You had to appear in court if
10 you weren't paid up, and if you were paid up,
11 you could call in and avoid court.

12 Do you understand that that's how the
13 system worked?

14 A Yes, sir. But that's not what took
15 place. Even when I was paying my fines, I still
16 had to come in.

17 Q When you were paying your fines, did you
18 call the court clerk before your court date and
19 ask for a new court date?

20 A Yes. And sometimes she would say that I
21 wasn't current even though I was paying my
22 fines, and so pretty much I have to come in.

23 Then when I come in, I never had to see
24 the judge; that they don't know who told me
25 that. All I had to do was pay. I could pay on

1 the phone. Like it was always the runaround.

2 Q Did you understand that if you didn't
3 appear and you didn't call and you didn't pay
4 that they could issue a warrant for you?

5 Did you understand that?

6 A Yes, sir. I just answered that.

7 Q All right. Do you see the document
8 titled "Order Granting Time to Pay Fines and
9 Costs" which is file stamped on September 28,
10 2018?

11 A Okay.

12 Q You have on there your employer name
13 Bama. What employer was that?

14 A Bama Pie. They was going to employ me,
15 but the warrant popped up. So they told me to
16 take care of the warrant and I can get employed,
17 but when that warrant got dropped, another one
18 popped up. So I was in orientation with Bama
19 Pie when I had to leave there and go to court.

20 Q You were in orientation with Bama. Did
21 you get paid for that?

22 A No, sir. I didn't complete the whole
23 orientation. I had to leave and go to court
24 because of the warrant.

25 Q Is it Bama that alerted you to the

1 warrant?

2 A Yes, sir. They do a full background
3 check.

4 Q Did you know about the warrant before
5 Bama brought it to your attention?

6 A No, sir.

7 Q What did you do to take care of that
8 warrant after Bama told you about it?

9 A I had to go pay.

10 Q Do you remember how much you paid?

11 A To have my warrants, for all of my
12 warrants to be lifted, it was always like \$300.

13 Q Did they recall the warrant after that?

14 A I don't recall.

15 Q You're living in Louisiana now?

16 A Yes, sir. Tallulah, Louisiana.

17 Q And you live with your mom?

18 A Yes, sir.

19 Q And anybody else?

20 A Nehemiah Jackson, Drizze Jackson, and
21 Deandrea Carter.

22 Q Okay. Those are your siblings?

23 A Yes.

24 Q Do you contribute to the rent or make
25 any payments for the housing you're receiving

1 **there?**

2 A Yes. Like after I get my hygienes and
3 bare necessities, whatever money I have left, I
4 spend on food and, like, housing and stuff and
5 try to get a ride back and forth to work.

6 Q Is where you're living now an apartment
7 or a home?

8 A A house.

9 Q It's a house?

10 A Yes.

11 Q Does your mom rent it or own it?

12 A My mom is renting it.

13 Q Do you help your mom pay for the rent?

14 A You say what?

15 Q Do you help your mom pay the rent?

16 A No -- I mean, I don't know -- like,
17 whatever money I have left, I give it to her,
18 and she buys food and things like that. So I
19 don't know if she's putting what I put, what I
20 put down, for rent or if she's just buying food
21 and, like, cleaning stuff.

22 Q What's your mom's source of income?

23 A She works at Burger King.

24 Q Are your siblings who live there
25 working?

1 A One is in school -- two is in school.
2 Two is in college and one -- yeah. One, he
3 works at Arby's. The other two are in school.

4 Q Do you know how much the rent is that
5 your mom is paying?

6 A No, sir.

7 Q You have a phone; right?

8 A Yes, sir.

9 Q What kind of phone do you have?

10 A I have a Samsung A10 -- A10e.

11 Q How much do you pay a month for your
12 phone?

13 A \$65.

14 Q Is that in your own name, or is it under
15 somebody else's plan?

16 A No, sir. It's in my own name.

17 Q How much would you say you pay for food
18 each month?

19 A Like, a little under \$150. I only make,
20 like, \$230 every check. So I pay my phone bill,
21 \$60, \$65. I get my necessities, whether it's
22 toothpaste, pads, tampons, whatever, and I give
23 my mom the rest.

24 Q Do you get a check each week?

25 A No, sir.

1 Q How often do you get paid?

2 A Biweekly.

3 Q Have you made any payments on your
4 Washington County court costs and fees in the
5 last three months?

6 A When I tried, they said that the court
7 system was closed due to COVID-19, and they
8 would give me a call back when it opened. That
9 was it. I tried three times.

10 Q Do you pay court fines, costs, and fees
11 to any other county court?

12 A Tulsa County, I was paying them \$25, but
13 no, nobody else.

14 Q Are you still paying Tulsa County \$25?

15 A No, sir.

16 Q Do you still owe anything on your Tulsa
17 County court fees and costs?

18 A No, sir. Not that I can recall.

19 Q How long have you been done with the
20 Tulsa County fines and costs, to the best of
21 your recollection?

22 A I would say I think I owed them like
23 \$900 and something, and I got it down to almost
24 like -- almost \$100, \$200. There's not much
25 left on it.

1 Q Okay. Is there anything left?

2 A I honestly don't know.

3 Q When is the last time you've made a
4 payment to Tulsa?

5 A I can't recall.

6 Q Do you think it has been more than six
7 months or --

8 A I don't know. I can't recall, honestly.

9 Q Do you owe court costs, fines and fees
10 to any other county other than possibly Tulsa
11 and Washington County?

12 A No, sir.

13 Q What other expenses do you have on a
14 monthly basis that are recurring?

15 A Hygienes, phone bill, food, gas to work,
16 and that's it.

17 Q How far is the McDonald's from where
18 you're living?

19 A A mile.

20 Q Oh. A mile? Okay.

21 How much could you afford to pay on your
22 court fines, costs, and fees per month?

23 A As of right now?

24 Q Yes.

25 A How my check is going, I can start off

1 at \$25. I'm barely making \$300 every two weeks.

2 Q If your court debt, fines, costs, and
3 fees, was limited to monthly payments of \$25,
4 would that help you out?

5 A It depends if there's -- are they going
6 to keep messing with me?

7 Q Let's say they lower it to \$25 and you
8 make the \$25 payments and you call every month
9 and get a new court date and it all flows along
10 smoothly.

11 If the amount was \$25, do you think you
12 would be able to do that?

13 A I can pay \$25 --

14 MR. LACOVARA: Hold on. Excuse me,
15 Sharonica. Just a second.

16 Devan, against what balance?

17 First of all, this is asking her to
18 speculate on a set of facts you haven't defined.

19 MR. PEDERSON: No. No. No. No. I'm
20 just asking --

21 MR. LACOVARA: And secondly, I'm not
22 sure it's proper.

23 MR. PEDERSON: She said she could pay --
24 I think she said she could pay -- I asked her
25 how much she could afford to pay with all of

1 her --

2 MR. LACOVARA: In perpetuity?

3 MR. PEDERSON: I'm asking today what
4 she --

5 MR. LACOVARA: In perpetuity? What
6 balance is she paying against?

7 THE REPORTER: I can't get the record if
8 you guys are talking at the same time.

9 I couldn't hear what you were saying,
10 Devan.

11 MR. LACOVARA: Are you asking her what
12 she's prepared --

13 MR. PEDERSON: No. No. I'm not asking
14 her to -- I was just asking her what she could
15 afford.

16 I think she said \$25 a month for -- let
17 me make sure. I think she did say for all of
18 her court debt.

19 Q (By Mr. Pederson) Sharonica, let me just
20 try and make it clear.

21 You may owe Tulsa, and you may owe
22 Washington County. Is that right?

23 A Say what?

24 Q For court funds, fees, and costs, you
25 might owe money to Tulsa County; right?

1 A Yes.

2 Q And you don't know exactly what is left?

3 A I don't know exactly.

4 Q You also owe fines, fees, and costs in
5 Washington County; right?

6 A Yes.

7 Q With your total court debt, including
8 Tulsa and Washington County, how much could you
9 afford to pay each month and still be able to
10 live a normal life?

11 MR. LACOVARA: Hold on. I'm going to
12 object to the form of that question, and to say
13 obviously, you're asking her, to some extent,
14 about an ultimate issue, but it's fair.

15 With the objection, Sharonica, please go
16 ahead and answer.

17 THE WITNESS: Okay.

18 Q (By Mr. Pederson) And, Sharonica, let me
19 -- he's objected to the form of my question. So
20 let me try to ask a better question. Let me ask
21 you a better question.

22 Including the fines, fees, and costs
23 with Tulsa County and Washington County, if you
24 could just make one payment for all those fees
25 and costs, how much could you afford to make for

1 all your fines, fees, and costs per month as you
2 sit here today?

3 MR. LACOVARA: Same objection.

4 But you can answer. Sharonica, you
5 answer his question.

6 THE WITNESS: \$25.

7 Q (By Mr. Pederson) Do you have any of
8 your old receipts for payments you have made in
9 the past?

10 A No, sir. It was all money orders. So I
11 just had the bottom half and the receipts to the
12 money order, and I used to write the amount that
13 I sent to them.

14 Q Do you still have a ledger or anything
15 like that that you keep those recorded on?

16 A Not that I can recall. I know, like I
17 said, the money order receipts were in OKC. I
18 don't know if they're still there in the safe.
19 I don't know.

20 Q How about any receipts that the court
21 might have given you? Would you have anything
22 like that?

23 A Yes, but not on me right now.

24 Q Do you have those in Louisiana there?

25 A Yes.

1 MR. PEDERSON: All right. Let me just
2 take, like, two minutes, and I'll be right back,
3 if that's all right.

4 MR. LACOVARA: Yeah.

5 Sharonica, just stay on the line. Don't
6 hang up, because I think we're getting pretty
7 close to the end.

8 THE WITNESS: Okay.

9 (Break from 3:00 p.m. to 3:05 p.m.)

10 MR. LACOVARA: Sharonica, you said you
11 just thought of something. Is it a correction
12 or something you need to make to a question that
13 was asked before?

14 THE WITNESS: Yes, sir. Yes, sir.

15 Okay. When he asked what can I pay, if
16 I'm barely making \$300 or anything, I can't pay
17 anything, because I don't have anything left
18 over after my food, after my bare necessities
19 and things.

20 MR. LACOVARA: Okay. That's on the
21 record.

22 Go ahead.

23 Q (By Mr. Pederson) Ms. Carter, we're back
24 from our break.

25 During our break, did you have an

1 opportunity to talk to your lawyer?

2 A No, sir.

3 Q In this federal case that we're here on
4 today, you understand that you're the Plaintiff
5 in this federal case against the three judges,
6 Judge Thomas, Sigler, and Vaclaw.

7 Is that right?

8 A Yes, sir.

9 Q What are you wanting to get out of this
10 federal lawsuit that we're here on today?

11 A For one, Bartlesville to leave me alone
12 and this case go away, and pain and suffering.

13 Q You changed your answer from \$25 a month
14 that you could afford to \$0 a month.

15 A Yes, sir. Due to the fact that I'm
16 barely making -- okay. \$65 for my phone bill,
17 then my bare necessities, all that. Then my
18 mom, I have to give her, you know what I'm
19 saying, some money for food. So until I get a
20 job or anything, I can't -- I can't even pay
21 that.

22 Q Well, you are working now, though;
23 right?

24 A Yes, sir.

25 Q Would you be able to pay \$5 a month?

1 A No, sir. I mean, unless I can get a
2 better job, I can't even pay that. Like I said
3 I'm barely making, what, \$300. I'm barely
4 making that.

5 I can barely pay for my phone bill. My
6 brother had to pay my phone bill this time. I
7 have documentation of that as well.

8 Now, I have been flat broke. So to your
9 answer, no, sir, I will not be able to pay.

10 **Q Since you can't pay at this time,**
11 **would it help you to be able to suspend your**
12 **requirement to pay fines and costs in Washington**
13 **County for --**

14 A I don't understand. I don't understand
15 that question.

16 **Q Would it help you out to get rid of your**
17 **requirement to pay fines and costs each month**
18 **for a period of six months until you're able to**
19 **get a better job or --**

20 A No, sir. Because who's to say it won't
21 be stacked on and doubled up like it did when I
22 was in the penitentiary. It went from \$1,000 to
23 almost \$8,000.

24 **Q Okay. So you're not interested in doing**
25 **that either?**

1 A No, sir.

2 MR. PEDERSON: All right. That's all
3 the questions I have. Thank you very much.

4 THE WITNESS: You're welcome. Thank you
5 too.

6 MR. LACOVARA: Devan, I just want to
7 make a quick representation on the record. I
8 know Jon might have some questions.

9 Just so it's clear, Ms. Carter did
10 amend an answer, but while we were on break, no
11 one, none of her counsel, spoke to her or
12 communicated with her in any way.

13 THE WITNESS: Yeah. I didn't speak to
14 anybody about it.

15 MR. LACOVARA: I just want that to be
16 clear on the record from counsel.

17 MR. PEDERSON: Thank you.

18 MR. LACOVARA: Sorry, Jon.

19 (Discussion held off the record)

20 CROSS EXAMINATION

21 BY MR. WILLIFORD:

22 Q Ms. Carter, can you hear me.

23 A Yes, sir.

24 Q Okay. Thank you. Sorry about that.

25 I appreciate you taking the time to meet

1 with us and answer some questions for us today.

2 A Yes, sir.

3 Q I'll be pretty brief. I don't have
4 nearly as much ground. Devan covered a lot of
5 it.

6 I represent a gentleman named Craig
7 Sutter and the Oklahoma Indigent Defense System.
8 Okay?

9 A Okay.

10 Q Just to start off with, because of all
11 the ground that Devan already covered, I may
12 jump around a little bit.

13 A Yes, sir.

14 Q So if my question -- if you don't
15 understand it and it doesn't make sense for any
16 reason, just let me know, and I'll do my best to
17 try to rephrase it or, you know, let you know
18 where it comes from. Okay?

19 A Yes, sir.

20 Q Ms. Carter, just so I know and I'm
21 clear, have you ever met Craig Sutter?

22 A Not that I can recall.

23 Q Okay. And just kind of to help me sort
24 of understand the timeline of events that led to
25 the Washington County case and to Ms. Sanders

1 being appointed for you, when you first met with
2 Ms. Sanders, where were you physically?

3 A In the courtroom. In the hallway in the
4 courtroom.

5 Q Is this in Washington County?

6 A Yes, sir.

7 Q Now, were you being held in detention
8 somewhere, or were you --

9 A Yes, sir. I was being held.

10 Q Where were you being held?

11 A Craig County Detention Center in Vinita.

12 Q And if I go over anything that Devan
13 already went through, forgive me. I'm going to
14 do that as little as possible because I know how
15 long you've been here today.

16 What was the reason you were being held
17 in Craig County?

18 A I guess to await my case and see what
19 happened.

20 Q What was the case in Craig County?

21 A There wasn't any case in Craig County.
22 I just got shipped to Craig County.

23 Q Okay. So you weren't being held on
24 another charge? It was just this same youthful
25 offender one that we've been talking about a lot

1 today?

2 A Yes.

3 Q Okay. No. I'm just trying to
4 understand.

5 So they just held you at Craig County
6 for your Washington County case?

7 A Yes, sir.

8 Q Okay. Okay. No. That's helpful.
9 Thank you.

10 How long were you being held before you
11 had an attorney appointed to represent you? Do
12 you know?

13 A From the day I got detained and
14 arrested, I've been in Craig County. I was at
15 Craig County.

16 Q Okay. But do you remember how long it
17 was until -- when you were first arrested until
18 you had a court-appointed attorney?

19 A From April until they sent me to COJC.

20 Q All right. Over the entire course of
21 your case, the Washington County case that we're
22 talking about, over the entire course of that,
23 about how many times did you meet with
24 Ms. Sanders?

25 A She never came to see me at the Craig

1 County Detention Center. So I only met with her
2 at court, and that was, like, a brief five
3 minutes before we go in and the judge started
4 talking.

5 So it was only always a brief five
6 minutes. It was never longer than that for me
7 to understand, to get the knowledge that -- you
8 know, I didn't understand anything at that time,
9 so...

10 Q Okay. But about how many times did you
11 meet with her over the entire course of your
12 case?

13 A All I know is every time I went or every
14 time I appeared for court, we met, and that was
15 it.

16 Q Okay. So we could just look back at,
17 like, the court records and see and count them
18 up from then?

19 A Yes, sir.

20 Q But you don't have an independent memory
21 of that?

22 A No, sir.

23 Q Is that right?

24 A Yes, sir.

25 Q Now, when she would go to court with

1 you, did she appear to be prepared for court,
2 for your case specifically?

3 A No. Because she would just come out of
4 the courtroom with somebody else, then she would
5 talk to me, and then she would go right, like,
6 literally, bend down talk to somebody else. So
7 I don't feel that she was, no, sir.

8 Q When she was discussing your case with
9 either the prosecutor or the judge on your case,
10 did she seem to be prepared and knowledgeable
11 about your case during those conversations?

12 A Yeah. Yes. Only what he would allow
13 her to.

14 Q "He" being the judge?

15 A Yes, sir. DeLapp.

16 Q Okay. Explain what you mean by that,
17 "only what he would allow her to."

18 A Like when I -- before it even got to the
19 no contest or anything like that, I told her --
20 I'm like, "Can you guys" -- she said something
21 about evidence, and they had my shoes and stuff.
22 I said, "Well, can you guys fingerprint the gun?
23 Because if you fingerprint the gun, I'm
24 innocent."

25 "No. He's very busy, and they're not

1 going to want to do that," and that's what I was
2 told.

3 And I'm like, "But a guy using my other
4 clothes and stuff is evidence. Why can't you
5 all fingerprint the gun?"

6 Q Okay. And that was a discussion you had
7 with Attorney Sanders?

8 A Yes, sir. Yes, sir.

9 Q And did you ever --

10 A And then she said that he --

11 MS. NAIK: Sharonica, if you could, just
12 let him finish the question before you answer.

13 THE WITNESS: Okay.

14 Q (By Mr. Williford) It's hard over this
15 digital. So, you know, I'm trying to bear with
16 you.

17 Did you ever hear Attorney Sanders have
18 that discussion with either Judge DeLapp or the
19 prosecuting attorney?

20 A No, sir. She never brought it up.

21 Q Okay. At least not in front of you?

22 A She never brought it up.

23 Q Did she ever meet with Judge DeLapp or
24 the prosecutor outside of your presence? Do you
25 know?

1 A When they went to the judge chambers.

2 Q Okay. She did sometimes meet with them
3 outside of your presence --

4 A Yes, sir.

5 Q -- and have discussions that you
6 couldn't hear? Right?

7 A Yes, sir.

8 Q Okay. This youthful offender case in
9 Washington County, was that the first time you
10 had ever been arrested and had a case, a formal
11 court case, brought against you?

12 A Can you repeat that?

13 Q Yeah. I'll try.

14 This case that we're talking about, this
15 youthful offender case in Washington County --

16 A Yes, sir.

17 Q -- is this the first criminal charge
18 that you know of that has ever been filed
19 against you?

20 A Yes. I guess, to my understanding. I
21 don't know.

22 Q Okay. You just don't know?

23 A No.

24 Q That's fair.

25 On the plea form that we looked at, it

1 mentioned a prior felony conviction?

2 A Uh-huh.

3 Q I think you told us earlier that that
4 was not true.

5 Do you remember that testimony?

6 A Yes.

7 Q Just so I'm clear and we're not
8 confusing terminology or the terms of something,
9 had you maybe entered a plea of guilty or no
10 contest to another charge before this Washington
11 County case?

12 A Not that I can recall.

13 Q Any of the discussion that we looked at
14 on that transcript about any prior cases, does
15 that ring any bell or refresh your memory about
16 any prior cases?

17 A Not that I can recall. I mean, I don't
18 know what you really mean.

19 Q Okay. I'm just trying to get a sense
20 of, you know, the other cases that you may have
21 had already before you that maybe went into
22 some of the discussions and the advice or
23 recommendations that you got from this
24 Washington County case.

25 A The -- what did it say? When I was in

1 school?

2 Q Or at any time before this Washington
3 County case.

4 A Not that I can recall. I mean, if -- if
5 -- convicted, no, I ain't.

6 Q Okay.

7 A This is my first conviction.

8 Q All right. No. That's what I wanted to
9 know.

10 A Okay.

11 Q I'm not trying to trick you or anything.
12 So if you don't know, just tell me you don't
13 know.

14 A Okay.

15 Q All right. So in any of the discussions
16 that you had with Ms. Sanders, did she outline
17 or did she describe the potential punishment
18 that you were facing for this charge?

19 A Yes, sir. It always went like --

20 Q And what did she tell you?

21 A It always went like, "Kid, this is the
22 best deal we got." We was even in the hallway
23 one time. "This is the best deal we got. Take
24 it, or they're going to send you to the
25 penitentiary for 15 years."

1 Q All right. And I'm going to assume --
2 tell me if this is wrong -- that you didn't want
3 to go to prison for 15 years?

4 A I told her to take it to trial and --

5 Q Right. I understand that you've told us
6 that, and I do. I'm not talking about that.
7 I'm just asking.

8 You didn't want to go to jail for 15
9 years; right?

10 A I wasn't guilty of -- no. No.

11 MR. LACOVARA: I don't know if this
12 would be helpful to you, but we're prepared to
13 stipulate that Ms. Carter is not challenging the
14 incarceration or the plea agreement insofar as
15 it relates to the fine of \$1,000 or the sentence
16 as it was carried out.

17 We've never had a claim on that.

18 MR. WILLIFORD: I'm not saying --

19 MR. LACOVARA: So I'm not sure where
20 these questions are going in terms of any issue
21 that's in dispute.

22 MR. WILLIFORD: I know. I know and
23 understand. We talked about this before. I
24 think it all kind of plays into each other, so
25 -- but I understand that that's your position.

1 MR. LACOVARA: Right. And just so you
2 know, obviously we're talking about events nine
3 years ago with a tired witness. So we are where
4 we are.

5 MR. WILLIFORD: I understand that too.
6 I understand too. I mean, my memory from last
7 week is -- I mean, especially this year. So I
8 understand.

9 Q (By Mr. Williford) Ms. Carter, if you
10 don't remember something, please just tell me
11 you don't remember, and I completely understand.
12 I'm just going to be as fair with you as I can,
13 and if I'm not being fair, let me know, and I'll
14 try to be --

15 A Okay.

16 Q At any time during any of your
17 discussions with Ms. Sanders, did she ever
18 mention how she was being paid?

19 A She just -- she always told me that she
20 wasn't getting paid.

21 Q Okay.

22 A She was just a public defender. So I
23 don't know.

24 Q Do you remember ever asking her about
25 how she was going to be paid?

1 A No, sir. I never did.

2 Q Did Ms. Sanders ever tell you anything
3 that you believed to be some sort -- that she
4 was somehow rushing your case just to get done
5 with it?

6 A Yes, sir. When I asked her to
7 fingerprint the gun, she said, "Your case is not
8 a big case like that. He has murder trials that
9 he -- he has murder trials going on. So we're
10 trying to go ahead and get through yours."

11 That's what I was told.

12 Q When you say "he," you mean Judge
13 DeLapp?

14 A DeLapp. Judge DeLapp.

15 Q Jude DeLapp. Okay.

16 A That he was very busy; that my case
17 wasn't like the murder cases. So they was
18 trying to hurry up and get me out of the way.

19 Q Okay.

20 A That's what she told me out of her own
21 mouth, Kristi Sanders.

22 Q Okay. Now, did you take that to mean
23 that Ms. Sanders was rushing your case or Judge
24 DeLapp was rushing your case?

25 A Both. Because the things that I asked

1 her to inquire about never once was brought up,
2 not even in front of me.

3 Like when I asked her to do something,
4 it was like, "Okay. If he allows me to."

5 That's what it was always was, "If he
6 allows me to."

7 Q Okay. And again, "he" is Judge DeLapp?

8 A "He" was Judge DeLapp, yes.

9 Q So she was trying -- "she" being
10 Attorney Sanders was -- it sounds like she felt
11 like she was a little bit kind of hamstrung and
12 a little bit tied by what Judge DeLapp was going
13 to do.

14 Is that fair?

15 MR. LACOVARA: I object to the form.

16 MS. NAIK: Objection. Form.

17 THE WITNESS: I was going to say I
18 didn't understand that anyway.

19 Q (By Mr. Williford) I apologize. I
20 apologize. I'll try to reask it. It was
21 clearly a bad question.

22 Did it sound to you like Attorney
23 Sanders felt like she kind of had her hands tied
24 by what Judge DeLapp was going to do?

25 A I don't know, honestly.

1 Q Okay. Now, on this case, this youthful
2 offender case, you entered what they call a
3 blind plea; is that right?

4 A She entered. Kristi Sanders entered a
5 blind plea. I wanted to go to trial.

6 Q No. I understand that. I understand
7 that's what you've told us.

8 A But it was entered on my behalf?

9 Q It was what they call a blind plea.
10 Do you know what that means?

11 A No. At the time, I didn't understand
12 anything what was going on except, "You're 15.
13 You're going to spend 15 years, or you take the
14 deal."

15 That's the only thing I understood. I
16 didn't understand the terms, what was going on,
17 the sentencing, the fines, none of that. I
18 didn't understand none of it.

19 Q All right. Ms. Carter, do you know if
20 your mother -- did she ever meet with Attorney
21 Sanders?

22 A With me in the hallway, and that's when
23 she told me, "That's the best deal" -- my mom
24 even heard that too. "That's the best deal we
25 got, kid. Take the deal."

1 Q Anytime other than that that your mom
2 met with Attorney Sanders that you know of?

3 A No.

4 Q Now, we looked at the plea agreement and
5 Mr. Pederson pointed it out -- this was Exhibit
6 1 -- that there were two dates on it, August 11,
7 2011, and September 22, 2011.

8 Do you remember looking at those two
9 dates with him?

10 A Yes, sir.

11 Q Do you remember if, on the August 11th
12 hearing -- did you go before Judge DeLapp on
13 August 11th?

14 A I can't recall, honestly.

15 Q Sure. No. I understand.

16 Do you remember going in front of him
17 twice to enter your plea?

18 A I can't recall.

19 Q Do you recall how many times you went in
20 front of Judge DeLapp on this particular -- on
21 the criminal charges?

22 A So many, I can't recall.

23 Q At any time do you remember Judge DeLapp
24 going through the plea discussion and the plea
25 paperwork with you and asking you questions

1 about what you had filled out?

2 A No. It was -- I was never asked
3 questions. It was just, "Do you understand?"

4 Q Did Judge DeLapp ask you if you
5 understood the paperwork?

6 A Yes.

7 Q And what did you tell him?

8 A My attorney said to say "yes."

9 Q And again, I know this was a long time
10 ago, so I understand that, you know.

11 Did you tell Judge DeLapp that your
12 attorney told you to say "yes," or did you just
13 say "yes"?

14 A She said, "Remember everything that we
15 talked about last time? Just do as I told you
16 to do when we met." That was it.

17 Q So Judge DeLapp did ask you if you went
18 through the paperwork with your lawyer?

19 A Yes.

20 Q And you told him "yes"?

21 A Well, he asked her, "Did you go over the
22 paperwork with your" -- I guess it's called --
23 whatever it's called.

24 And she said, "Yes, sir, we did."

25 And she turned to me, and she said, "Do

1 you remember the last time?"

2 And I said, "Yeah."

3 Q Is that all you said at this hearing?

4 A That's the only thing I was saying,
5 yeah.

6 Q Did Judge DeLapp ever ask you to
7 describe why it was or describe the crime that
8 you were charged with?

9 A No, sir.

10 Q Like the facts of the crime, how it
11 occurred, who was involved, did you ever have
12 that discussion in the courtroom with him at
13 all?

14 A No, sir. I don't even think they put me
15 on the stand.

16 Q Did you tell Judge DeLapp or express
17 to him, you know, your concerns about this
18 fingerprinting issue or the fact that you didn't
19 actually understand anything on the --

20 A No, sir. He never really gave me the
21 chance to talk. It was always, "Good luck.
22 Pack your toothbrush," things like that.

23 He was always short and, like, snappy
24 with me, and he just --

25 MR. LACOVARA: I'm sorry. If this is

1 incorrect, Jon, let me know.

2 Sharonica, I think he was asking you
3 about before you made the plea; not when you
4 went back for fees and costs.

5 MR. WILLIFORD: Correct. Yes.

6 MR. LACOVARA: I know it's late in the
7 day.

8 THE WITNESS: No. Even then, Judge
9 DeLapp has never approached me with any ounce of
10 respect, ever. Before and after, never.

11 Q (By Mr. Williford) Before you entered
12 the plea, did he ever ask you, "Okay.
13 Ms. Carter, I want you to tell me about this
14 crime that you've been charged with and tell me,
15 you know, the facts of it, why you are entering
16 this plea of no contest"?

17 Did he ever do that?

18 A Not that I can remember. I never had a
19 chance to speak.

20 Q Okay. That's all I want to know.

21 Again, this is before you got the fines
22 and costs and that sort of stuff?

23 A Yes, sir.

24 Q Do you remember what he actually
25 sentenced you to, Judge DeLapp sentenced you to,

1 in this youthful offender case?

2 A Five -- five -- no. 18 months.

3 Q 18 months to do?

4 A Yeah. Upon -- upon completion -- I
5 could be let out early if I take all my classes
6 and all that. And I was in classes and all of
7 that, and I still didn't get out early.

8 Q We've seen some paperwork. I think we
9 looked at it in the plea agreement, in Exhibit
10 1, about a five-year suspended.

11 Do you remember that?

12 A Yeah. I remember seeing it.

13 Q Is that your understanding of what you
14 were asking Judge DeLapp to do at that point was
15 a five-year suspended sentence?

16 A I had no understanding. I wanted to go
17 to trial.

18 Q Did you understand that if you went to
19 trial, you could face potentially life in
20 prison?

21 A Yes, sir. I understood that completely.

22 Q Okay. And you were okay taking that
23 risk?

24 A Yes, sir.

25 Q Do you believe that there is -- this is

1 kind of a strange question, so forgive me.

2 Do you believe that there's some sort of
3 information that if Ms. Sanders had told you or
4 had offered to you that would have changed your
5 mind about what you did in this youthful
6 offender case?

7 A Absolutely.

8 Q What's that?

9 A If she would have told me like, "They're
10 considering this as 85 percent. Your fine is
11 not -- it's going to be this much," all that, I
12 would have went a different route.

13 Q Okay. But you --

14 A But I had no choice.

15 Q Did you ever ask either your attorney,
16 Sanders, or your mom or anybody else, maybe
17 somebody in jail, anybody else, about the
18 possibility of revoking the plea or appealing it
19 or anything like that?

20 A I asked Kristi, "Can I have" -- about
21 the appeals thingy, because I didn't understand
22 that either until she was like --

23 She had said, "Well, an appeal is after
24 the conviction. You fight for your appeal, and
25 if they say, 'Yeah,' then, you know, you get to

1 come back in court, and we do it all over
2 again."

3 Q Okay. I'm going to jump here just a
4 bit. So bear with me.

5 You told us this a few times, and I
6 don't remember the answer, so forgive me. This
7 was a 33 percent crime is what you thought you
8 were being charged with.

9 Who told you that it was a 33 percent
10 crime?

11 A Kristi Sanders.

12 Q Kristi Sanders told you that this --

13 A Kristi Sanders.

14 Q And what did you understand that to
15 mean?

16 A Meaning, like, I would have to do 18
17 months.

18 Q Where is the 18 months coming from?
19 What is that based off of? Do you know?

20 A She added it up, 33, I guess, of five is
21 18 months. Like, I don't know. That's what she
22 kept saying.

23 Q But Kristi Sanders told you that?

24 A Yes.

25 Q How much time did you serve for this

1 Washington County case, this youthful offender
2 case?

3 A Whew. I just got out in 2017.

4 Q Now, also right around this same time,
5 you picked up another charge out of Tulsa
6 County --

7 A Yes. For my fines. Yes, sir.

8 Q And that resulted in the Washington
9 County suspended sentence being revoked; right?

10 A Yeah. I guess, yeah.

11 Q Okay. So the other crime in --

12 MR. LACOVARA: I sorry, Jon. I'm not
13 sure -- just looking at Sharonica, her face --

14 MR. WILLIFORD: Okay.

15 MR. LACOVARA: Did you understand what
16 he just asked?

17 Could you just ask it again, Jon, more
18 slowly? Because I just saw some hesitation. I
19 wasn't sure that she understood the question.

20 Q (By Mr. Williford) Sharonica, did you
21 understand my question?

22 A Can you repeat it for me?

23 Q I'll try. I'll try. I'll try to think
24 back to which question it was.

25 The suspended sentence in Washington

1 County that you got, that was revoked because of
2 the Tulsa County charges.

3 Do you understand that?

4 A I thought it was revoked because I had
5 -- I didn't understand that -- I didn't
6 understand that it was being revoked. I just
7 thought -- I don't know. I didn't understand
8 it.

9 Q Okay.

10 A And I ain't going to sit here and lie
11 and try to make it like I did.

12 No, I did not.

13 Q No. That's fine. No. I appreciate
14 that. And I may have misheard you, so...

15 Did you say the Tulsa charge for
16 counterfeiting, was that done to help pay your
17 Washington County fees and costs? Did I
18 understand that right or just --

19 A Yeah.

20 Q No. That's fair. I'm just trying to
21 clarify here. I appreciate that.

22 All right. I want to jump ahead, and
23 then I'll be about done. I promise.

24 The hearings that you went to in
25 Washington County, the ones you did go to for

1 the fines, fees, and costs docket, I want to
2 focus on those for a second. Okay?

3 At any of those hearings was there,
4 like, a prosecutor or a DA, district attorney?
5 Were they there, or was it just the judge and,
6 like, a bailiff?

7 A Okay. At the time that my mom had to
8 pay, it was just DeLapp, the bailiff, me, and my
9 mom. That was it. It wasn't no court reporter,
10 no none of that up in there.

11 Q Okay. So there was nobody there
12 that was actually, like, say, representing the
13 State --

14 A No, sir. No, sir,

15 Q Let me finish my question. Let me
16 finish first, and then you can tell me "no."
17 Okay?

18 A Okay.

19 Q There was nobody there that was
20 representing the State of Oklahoma like there
21 was when you were pleading in the criminal
22 charges. Is that correct?

23 A When I went --

24 MR. LACOVARA: Objection to the form of
25 the question.

1 THE WITNESS: Huh?

2 MR. LACOVARA: I said "object to the
3 form," but go ahead and answer.

4 Thanks, Sharonica. Just doing the
5 lawyer thing for a moment there.

6 THE WITNESS: When I went in that time,
7 see, I didn't have no attorney with me. He
8 didn't have no -- it was just him, the bailiff,
9 me, and my mom.

10 Q (By Mr. Williford) Okay.

11 A And that counterfeit for Tulsa, I was
12 put in a bad spot then. I take responsibility
13 on my part, but I didn't know that the money was
14 fake. I was just, "Somebody gave me some money
15 right here."

16 Q Let me go back to this, because I got
17 sidetracked in my own brain, and I apologize.

18 The blind plea.

19 A Uh-huh.

20 Q Now, I know you've told me that Sanders
21 entered that on your behalf.

22 Do you understand that that means that
23 there's not an agreement between you and the
24 State as to what sentence they're going to
25 recommend to the judge?

1 A You said that it wasn't? Can you repeat
2 that?

3 Q Sure. A blind plea is when you go
4 before the judge and you don't have an agreement
5 with the State or the prosecuting attorney on a
6 sentence to recommend.

7 A Yes.

8 Q All right. And you understand today, as
9 we sit here today, that that's what a blind plea
10 is?

11 A Yes. I understand today what a blind
12 plea is, yes.

13 Q And you told us you didn't understand it
14 back in 2011?

15 A No, sir. She -- no, sir. No, sir.

16 MR. WILLIFORD: I think that's about all
17 the questions I've got.

18 I don't know if you guys have any more
19 or if Devan has any more or whatever, so...

20 I appreciate your time, Ms. Carter.
21 Thank you so much.

22 THE WITNESS: Yes, sir. Thank you too.

23 MS. NAIK: Michael, should we just take
24 a couple of minutes before we go off the record?

25 MR. LACOVARA: I'm just looking at

1 Sharonica, who looks so tired. I don't think
2 there's --

3 And I'll tell you, Sharonica, I have
4 testified in my life a few times. It's the
5 worst. Being a witness is tough.

6 THE WITNESS: It is.

7 MR. LACOVARA: I don't think the
8 Plaintiff has any questions.

9 I would like to thank the court reporter
10 for her patience, and if you have any other
11 spellings before we --

12 I think, Devan, if you and Jon are okay,
13 we can go off the record, and then if there are
14 other spellings, we can just do those off the
15 record.

16 MR. PEDERSON: Yeah. We can close it.

17 MR. LACOVARA: Okay. Thanks, everybody.

18 (Deposition adjourned at 3:41 p.m.)
19
20
21
22
23
24
25

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

JURAT

STATE OF OKLAHOMA)
)SS:
COUNTY OF _____)

I, SHARONICA CARTER, do hereby state
under oath that I have read the above and
foregoing deposition in its entirety, and that
the same is a full, true, and correct
transcription of my testimony so given at said
time and place, except for the corrections
noted.

SHARONICA CARTER

Subscribed and sworn to before me, the
undersigned Notary Public in and for the State
of Oklahoma, by said witness, on this, the _____
day of _____ 2020.

NOTARY PUBLIC

My Commission Expires: _____

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

CERTIFICATE

STATE OF OKLAHOMA)
)SS:
COUNTY OF OKLAHOMA)

I, Karen Dauphin Albert, Certified
Shorthand Reporter within and for the State of
Oklahoma, do hereby certify that the witness was
by
me first duly sworn to testify the truth, the
whole truth, and nothing but the truth, in the
case aforesaid, taken in shorthand and
thereafter transcribed; that the same was taken
pursuant to stipulations hereinbefore set out;
and that I am not an attorney for nor relative
of any of said parties or otherwise interested
in the event of said action.

IN WITNESS WHEREOF, I have hereunto set
my hand and seal this 9th day of November, 2020.



Karen Dauphin Albert, CSR, RPR
CSR No. 0153

WORD INDEX

< \$ >

\$0 128:14

\$1,000 103:19, 24

104:20 107:6, 11

129:22 140:15

\$1,300 99:7

103:25 104:23

107:12

\$10 49:13 54:23

57:21

\$10,000 89:15, 22

\$100 29:5 121:24

\$100,000 27:1

38:25 40:11 72:9,

10, 12

\$11 26:14 54:23

\$150 34:14

120:19

\$200 34:14

121:24

\$230 120:20

\$25 29:9 30:13

74:18 110:9, 18

121:12, 14 123:1,

3, 7, 8, 11, 13

124:16 126:6

128:13

\$250 103:19

104:21 107:6, 12

\$30 74:18

\$300 56:13

118:12 123:1

127:16 129:3

\$330 32:24

\$5 128:25

\$50 29:6 36:21

38:10, 11 61:19

64:10, 14, 15, 16,

18 77:13, 16 78:5,

6, 18 79:2 111:4

114:14, 21 115:7

\$60 120:21

\$65 120:13, 21

128:16

\$7.25 57:3 62:6

74:15

\$75 29:8 30:12

64:15 110:2, 7, 10,

21, 24 111:2, 7, 10

114:10, 12

\$8,000 129:23

\$9 49:13

\$900 121:23

\$922 103:18

< 0 >

0153 160:20

< 1 >

1 3:12 63:6 65:5

82:10 105:24

145:6 149:10

1(B) 101:17

1:10 75:20

1:30 112:5

10 46:13 86:1

97:17 107:5

108:2

10:44 1:13

10022 1:21

105 3:12, 13

109 3:14

10-year 97:13

107:24 108:11

11 80:15 86:7

145:6

11/1/2019 65:15

11/17/2017 110:2

11:08 41:20

11:26 41:20

11th 145:11, 13

12 86:12 113:25

12:18 75:20

12-hour 49:25

50:3, 16 55:2

13 87:5

130 3:1

13th 25:15

14 87:17 88:12,

13, 25

15 18:22 68:17

72:11 96:16, 18

108:3 139:25

140:3, 8 144:12,

13

15-year 108:6, 9

16 18:20, 23

19:10 83:4 89:13

90:1 96:18

17 90:7 109:20

17th 110:3

18 19:22 45:15

55:24 56:17

67:15 90:3, 5

95:3 97:17, 20

149:2, 3 151:16,

18, 21

18.5 19:15

18th 62:11, 14, 20

65:22, 23, 24 66:1

68:21

19 56:17 62:22

65:21 95:24

19-cv-234-JFH-

FHM 1:2

19th 62:11, 21

65:25

< 2 >

2 1:13 3:13 4:6

101:25 105:25

106:14 107:23

108:18 159:1

2:18 113:18

2:32 113:18

2006 7:9

2011 60:21 80:15

81:21 105:17

145:7 156:14

2013 99:4 103:13

2014 23:21 99:5

2017 23:20, 21

24:23 25:10

109:20 152:3

2018 28:19 29:25

37:5, 7, 8 112:4

114:9 115:4

117:10

2019 37:6, 7 48:7,

9 56:23, 24, 25

58:6 61:10, 11

62:22 63:1, 6

64:17 65:6, 21

67:15

2020 1:13 4:6

62:3 74:10

158:18 159:1

160:7

21 62:25

212.906.1605 1:21

21st 2:4, 9 63:14

22 80:15 105:17

145:7

23 81:1 96:20, 23

98:3

25 57:6

28 114:9 115:4

117:9

29 99:25

< 3 >

3 3:14 82:21

102:2 109:17

3:00 36:21 38:4,

9, 11 61:19 77:18

78:5, 6, 10 79:3

111:4, 5 114:14,

22 115:7 127:9

3:05 127:9

3:41 157:18

30 25:22 34:7, 9,

22 36:11 40:21,

22 75:10, 16

99:25 100:13

300-and-some

27:18 31:5

31 99:4 101:1, 13

313 2:4, 9

32 100:5 101:1,

13

33 88:3 90:4

151:7, 9, 20

35 25:22

< 4 >

4 45:20

40 50:4

405 60:15

405.522.2931 2:10

405.522.2944 2:5

<p>< 5 > 5 3:1 83:7 84:13 112:4 5:00 33:9, 11 550-30-something- 78 60:15 5th 112:8</p> <p>< 6 > 6 84:19 101:18 6:00 45:3 61st 70:18, 21</p> <p>< 7 > 7 85:1 703-9684 60:17 73105 2:5, 10</p> <p>< 8 > 8 85:6, 16 114:1, 3, 4, 6 8.5 12:1 85 88:1, 3 90:5 150:10 885 1:20</p> <p>< 9 > 9 85:18 90 44:21 918 60:17 9th 160:7</p> <p>< A > A.M 1:13 41:20 A10 120:10 A10e 120:10 AAON 48:12, 15 52:15 54:8, 11, 16 A-A-O-N 54:10 ability 76:6 84:21 able 6:9 10:10 13:25 25:7 76:5 115:20 123:12 125:9 128:25 129:9, 11, 18 absolutely 74:1 150:7</p>	<p>AC 52:5 54:13 academy 44:3 accurate 109:12 acid 49:4 50:12 51:4 action 160:7 add 36:5 added 151:20 Addendum 101:21 addition 97:24 additional 103:20 address 7:25 8:1 20:3 112:19, 20, 21, 23 adjourned 157:18 administrator 112:14 116:3 adult 16:5, 6 Adults 87:19 advice 138:22 affect 84:20 afford 111:7 122:21 123:25 124:15 125:9, 25 128:14 aforesaid 160:7 afternoon 77:17 age 18:13, 18 23:20 83:4 93:6 agency 39:13 ago 36:19 61:4 141:3 146:10 agree 101:20 agreed 81:19 agreement 3:12 agreement 105:23 140:14 145:4 149:9 155:23 156:4 ahead 81:16 104:15 125:16 127:22 142:10 153:22 155:3 ain't 24:4 64:21 68:10, 14 70:6 71:9 72:12 87:13 104:25 110:9 139:5 153:10</p>	<p>Air 48:12 51:2 54:8 Akilia 8:22 47:19, 20, 21 48:4, 6 al 1:2, 8 Albert 1:25 4:7 159:1 160:5, 20 alerted 117:25 allegations 86:2 allocution 109:13 allow 64:4 135:12, 17 allowing 93:5 allows 143:4, 6 altogether 103:25 104:23 Alysha 1:19 alysha.naik@lw.co m 1:22 AMANDA 1:2 amend 130:10 amount 123:11 126:12 and/or 89:15 answer 10:16 78:15 82:5, 6 84:24 85:4, 10 100:8, 9 125:16 126:4, 5 128:13 129:9 130:10 131:1 136:12 151:6 155:3 answered 90:9, 16 96:1 117:6 answering 83:18 102:11 answers 81:13 84:1 96:24 101:21, 25 anybody 40:23 118:19 130:14 150:16, 17 anymore 51:19 anyplace 59:19 Anytime 145:1 anyway 143:18 apart 46:13</p>	<p>apartment 20:6, 9 47:23 70:25 119:6 Apartments 8:13 9:20, 23 10:4 20:10 apologize 143:19, 20 155:17 apparently 96:2 appeal 106:18, 20 150:23, 24 appealing 150:18 appeals 150:21 appear 60:3 65:16 93:19 94:15 112:3, 7, 10, 11, 15 115:25 116:4, 6, 9 117:3 135:1 appearance 69:9 109:19 APPEARANCES 1:17 2:1 appeared 35:21 134:14 appearing 94:13 application 59:13 applications 23:7 applied 21:23 22:5 27:14 58:17 59:10 appointed 132:1 133:11 appreciate 100:10 130:25 153:13, 21 156:20 approached 148:9 Approximately 9:18, 22 56:11 April 19:4, 6, 8 29:24 133:19 Arby's 74:22 75:3 120:3 argue 73:2, 4 arrest 37:11 63:10 67:24 72:19 75:6 arrested 33:4 36:16, 18 38:15,</p>
---	---	---	---

21 39:10 40:23
41:2 73:20 74:4
133:14, 17 137:10
asked 30:3 31:6
33:15 35:13
37:25 40:6, 7
43:7, 16 51:20
56:13 64:20 74:3
78:17 90:18
101:5 105:4
109:7 123:24
127:13, 15 142:6,
25 143:3 146:2,
21 150:20 152:16
asking 5:17 6:12
78:8 81:25 94:6
107:23 123:17, 20
124:3, 11, 13, 14
125:13 140:7
141:24 145:25
148:2 149:14
asks 100:9
assert 81:24
assistant 52:7
55:17
assume 140:1
Attachment
103:15 104:17
105:7
attempted 86:13,
21 87:2, 4, 23
99:10
attended 11:20
attention 118:5
ATTORNEY 2:4,
9 36:3, 7 42:14
88:21 91:19, 20,
25 92:3, 16, 18, 24
93:1, 17, 24 94:3,
16, 19, 23 96:5
101:18 108:9
133:11, 18 136:7,
17, 19 143:10, 22
144:20 145:2
146:8, 12 150:15
154:4 155:7
156:5 160:7
attorney-client

81:19
attorneys 5:20
attorney's 94:12
August 19:6, 8
21:6 80:15 145:6,
11, 13
aunt 7:19 77:14
auntie 37:1
64:12, 15
authority 102:9
Avenue 1:20
average 49:24
57:5 74:17
avoid 116:11
await 132:18
aware 112:6
awkward 46:6
AZZ 48:10, 15, 21,
22 49:7 52:14, 17
53:9, 17

< B >
back 18:7 23:8
24:10, 15, 21
26:21 27:13, 22
29:11 34:15, 24
35:3, 7, 9 36:4
39:24 40:9, 10, 20
41:21 44:16 45:4
47:7, 8, 13, 14
48:3, 5, 8 52:24
53:14 63:3, 6
69:6 70:11 73:18
74:6 81:21 90:11
91:17 93:18
94:18 95:2 99:3
104:15 111:10
119:5 121:8
127:2, 23 134:16
148:4 151:1
152:24 155:16
156:14
background 6:20
21:13 22:10, 15,
18, 20 26:24
59:14 118:2
bad 70:21
143:21 155:12

Bailiff 33:23
35:16 36:14
154:6, 8 155:8
balance 123:16
124:6
Bama 117:13, 14,
18, 20, 25 118:5, 8
bare 119:3
127:18 128:17
barely 123:1
127:16 128:16
129:3, 5
bargain 81:2
97:2, 5, 9
Bartlesville 27:22
29:11 30:4, 12
47:1, 12 79:4
128:11
base 71:8, 23
based 10:16 28:3
41:2 71:25 95:17
103:2 151:19
basics 16:19
basis 14:25
45:12 122:14
basketball 14:18
Bassett 11:18
16:2, 6 23:18, 19,
24 24:2, 7, 11, 17,
23 29:14 41:24,
25 42:1, 24 43:4,
17 44:4 45:24
60:25 99:19
bat 28:18 55:7
60:16 107:3
Bates 79:15, 20, 22
Bear 62:24
115:18 136:15
151:4
begged 96:12
BEGINNING
1:13 25:16
BEHALF 1:13, 18
2:1, 6 83:23 91:3
101:7 144:8
155:21
believe 71:5
149:25 150:2
believed 142:3

Bell 48:13 56:20,
21 57:8 58:3, 5, 9,
10 59:3 61:21
62:1 109:5
138:15
bend 135:6
best 28:8 81:10
84:8 86:10 90:21
96:14 100:24
121:20 131:16
139:22, 23 144:23,
24
bet 41:9, 18
better 10:15
125:20, 21 129:2,
19
big 49:2 50:23
54:13 57:15, 17
92:12 93:13 96:7
142:8
bigger 93:12
bill 120:20
122:15 128:16
129:5, 6
birthday 19:11
bit 6:20 11:25
12:7 58:2 80:12
91:16 92:11
131:12 143:11, 12
151:4
Biweekly 121:2
blind 90:17, 24
98:3 144:3, 5, 9
155:18 156:3, 9,
11
bold 93:13
bond 63:2 72:9,
10, 11
book 34:16
boot 47:10
born 6:21
boss 49:9 54:1
55:5
bosses 54:4
bottles 57:12, 13,
14, 19
bottom 126:11
box 14:8

<p>boyfriend 42:3</p> <p>boys 17:23 18:1</p> <p>brain 96:7 155:17</p> <p>break 6:16, 17 9:6 41:10, 20 75:20 113:10, 18 127:9, 24, 25 130:10</p> <p>brief 91:13 131:3 134:2, 5</p> <p>bring 53:10</p> <p>bringing 26:20 94:21</p> <p>brings 71:20</p> <p>broke 129:8</p> <p>brother 129:6</p> <p>brought 26:22 44:16, 17 118:5 136:20, 22 137:11 143:1</p> <p>brown 92:11 112:1</p> <p>Bryant 8:10</p> <p>Buchanan 94:20</p> <p>Build 54:12</p> <p>building 12:16</p> <p>buildings 54:14</p> <p>Burger 119:23</p> <p>business 55:20</p> <p>busy 135:25 142:16</p> <p>butcher 55:17</p> <p>buying 119:20</p> <p>buys 119:18</p> <p>< C ></p> <p>call 15:5 23:8 37:23 39:4, 6 40:13 73:23 91:15 99:15 116:11, 18 117:3 121:8 123:8 144:2, 9</p> <p>called 27:2, 17 28:3, 7, 23 30:18 37:13, 24 40:18 43:7, 9, 11, 13 52:6 59:24 60:4,</p>	<p>6, 7 64:3 73:24 146:22, 23</p> <p>calls 45:25</p> <p>Campbell 53:18</p> <p>car 34:17 39:25 40:1, 9, 21, 23 66:20 67:17 68:12 73:10</p> <p>care 28:16 117:16 118:7</p> <p>career 11:6, 7, 15 12:8, 9, 13 16:2</p> <p>carried 140:16</p> <p>CARTER 1:9 4:4 5:1, 6 7:17, 19 8:22, 23, 24 33:21 62:25 67:20 68:7 75:21, 25 76:3, 19, 23 77:6, 14, 19 78:1 81:19 82:13 88:19 96:10 104:15 108:20, 24 109:2 113:6 118:21 127:23 130:9, 22 131:20 140:13 141:9 144:19 148:13 156:20 158:6, 13 159:1</p> <p>Carter's 81:24 113:21</p> <p>Case 1:2 18:22 20:25 22:23 31:16 42:14 43:19 69:2, 19 73:12 75:24 76:20 80:14 93:12, 25 102:13 103:1 106:23 128:3, 5, 12 131:25 132:18, 20, 21 133:6, 21 134:12 135:2, 8, 9, 11 137:8, 10, 11, 14, 15 138:11, 24 139:3 142:4, 7, 8, 16, 23, 24 144:1, 2</p>	<p>149:1 150:6 152:1, 2 160:7</p> <p>cases 93:8, 12 138:14, 16, 20 142:17</p> <p>caseworker 94:23</p> <p>casino 74:22 75:1, 3</p> <p>categorized 16:8</p> <p>Cater 8:22</p> <p>Caucasian 92:10 111:19</p> <p>cell 112:24</p> <p>Center 18:24, 25 23:18 102:21 132:11 134:1</p> <p>certain 77:16</p> <p>certainly 104:12</p> <p>CERTIFICATE 160:1</p> <p>certificates 13:1</p> <p>certification 12:24 13:3</p> <p>Certified 4:7 160:5</p> <p>certify 160:7</p> <p>cetera 103:19</p> <p>challenging 140:13</p> <p>chambers 137:1</p> <p>chance 5:19 27:8 36:2 59:7 147:21 148:19</p> <p>change 74:19 111:6, 8, 9</p> <p>changed 128:13 150:4</p> <p>charge 132:24 137:17 138:10 139:18 152:5 153:15</p> <p>charged 86:13 87:1, 4 147:8 148:14 151:8</p> <p>charges 145:21 153:2 154:22</p> <p>check 26:24 56:12 59:14</p>	<p>118:3 120:20, 24 122:25</p> <p>checked 44:5</p> <p>checking 46:3</p> <p>checks 53:7</p> <p>childhood 7:5 108:14</p> <p>choice 150:14</p> <p>choices 88:13</p> <p>Christmas 26:10</p> <p>cigarettes 45:23</p> <p>circled 81:5 82:5 83:9 86:3 88:7, 8, 13, 14, 17, 24, 25 89:16 90:15 96:3, 4 97:3 101:2, 4, 15</p> <p>circling 83:19 96:5</p> <p>City 2:5, 10 24:24, 25 25:8 26:19 27:3, 11, 15 44:1 112:23</p> <p>Civil 4:5</p> <p>claim 140:17</p> <p>claims 86:9</p> <p>clarify 153:21</p> <p>classes 12:2 16:20 149:5, 6</p> <p>cleaning 119:21</p> <p>clear 73:17 88:9 124:20 130:9, 16 131:21 138:7</p> <p>cleared 32:12 40:16 63:25</p> <p>clearly 82:1 143:21</p> <p>clerk 30:18 31:21 114:17 116:18</p> <p>clever 41:15</p> <p>Close 37:8 56:6 113:13 127:7 157:16</p> <p>closed 44:12 56:4 121:7</p> <p>clothes 27:23 47:8 136:4</p>
---	--	--	---

<p>Coble 76:25 77:2 C-o-b-l-e 77:4 coed 17:6, 22 coercion 100:15 COJC 14:21, 22, 23 15:25 16:5, 7, 16, 21, 24 17:3, 5, 6, 7, 14, 22 18:19, 24 19:10, 13, 19, 22 95:23 102:19, 23 103:3, 4, 11 105:21 133:19 collect 99:10 college 24:3, 5 120:2 color 111:23, 25 Comanche 8:13 9:19, 23 come 15:16 27:2, 19 28:11, 12 29:22 30:16, 21 31:1 32:10 33:7 34:12, 23 35:3, 9 36:21 37:15 38:9 39:7 46:24 61:9 63:16, 21 64:6 70:24 77:11 91:13 92:20 101:8 116:16, 22, 23 135:3 151:1 comes 67:17 131:18 coming 105:4 109:3 151:18 comment 70:1 Commission 158:20 commit 78:4, 9 committing 78:7 communicated 130:12 companies 57:16 Company 48:13 compensation 103:24 104:22 complete 80:2 117:22 completed 11:3, 6 83:4 99:9 101:19</p>	<p>completely 141:11 149:21 completeness 97:25 completion 149:4 complexes 70:25 compulsion 100:15 concede 81:22 concerns 147:17 confined 85:8 confusing 18:15 138:8 consequences 85:19 considering 150:10 constantly 68:25 69:1 contact 42:2 43:3, 5 45:2 75:7 112:14 116:2 contaminated 13:24 contempt 31:18 32:16 contents 101:20 contest 90:25 91:3 95:4, 8, 12, 18 97:7 100:14 135:19 138:10 148:16 context 70:1 continued 2:1 continuously 74:11 contradicted 73:7 contribute 118:24 conversation 109:6 110:25 conversations 135:11 convicted 87:6, 10, 13, 15 139:5 conviction 87:22 138:1 139:7 150:24 copies 79:16 copy 86:1, 5</p>	<p>correct 73:21 82:14, 19, 24 83:5 84:24 85:4, 10 86:4, 10 87:9 88:19 89:2, 10 97:4 102:1 106:4 148:5 154:22 158:9 correction 127:11 Correctional 23:18 43:22, 24 corrections 158:11 correctly 85:16 90:10, 16 96:1 correspond 105:19 106:14 COs 42:6 cost 76:8 112:14 116:2 costs 28:2 33:6 36:16 38:22 41:3 63:3 65:16 98:16 99:11 103:18 109:18 110:12, 18 111:1 112:4, 7, 13 115:22 116:1 117:9 121:4, 10, 17, 20 122:9, 22 123:2 124:24 125:4, 22, 25 126:1 129:12, 17 148:4, 22 153:17 154:1 Counsel 109:14 130:11, 16 counselor 15:7 count 134:17 counterfeit 155:11 counterfeiting 153:16 counties 93:9 County 18:23, 25 19:12 21:1, 8 22:22 23:16 24:20 27:1, 18, 25 28:24 29:4, 7, 8, 9 30:15 32:1 33:5 35:6 38:23 39:4, 5, 6 41:4 44:16,</p>	<p>17 45:3 58:23 59:24 60:2, 18, 19 61:6, 12 69:19 71:6, 14, 17 72:7, 9, 14, 20 73:24 74:24, 25 75:6 76:8, 21 79:25 87:8 102:20 105:1 121:4, 11, 12, 14, 17, 20 122:10, 11 124:22, 25 125:5, 8, 23 129:13 131:25 132:5, 11, 17, 20, 21, 22 133:5, 6, 14, 15, 21 134:1 137:9, 15 138:11, 24 139:3 152:1, 6, 9 153:1, 2, 17, 25 158:4 160:3 couple 10:8, 23 156:24 course 133:20, 22 134:11 courses 16:15, 18 24:3, 5 COURT 1:1 6:2 18:7 28:2 30:18 31:21 35:10 37:9, 10 39:7 47:6 59:25 60:2, 5 62:15, 17 63:9, 11, 12, 13 65:2, 7, 15 69:9 76:8 77:11 82:22 83:1 86:23 91:11, 12, 16 92:20 94:14, 15, 18 95:12 99:4, 17, 21 102:4 103:18 107:22 109:1, 6, 8 110:12 112:15 114:11, 17 116:3, 6, 9, 11, 18, 19 117:19, 23 121:4, 6, 10, 11, 17 122:9, 22 123:2, 9 124:18, 24 125:7 126:20 134:2, 14, 17, 25 135:1</p>
---	--	---	---

<p>137:11 151:1 154:9 157:9 court-appointed 133:18 courthouse 35:7 63:1 courtroom 6:2 31:17 32:18 35:12 37:22 107:8 132:3, 4 135:4 147:12 Courts 108:20 covered 131:4, 11 COVID-19 121:7 Craig 18:23, 25 19:12 102:20 131:6, 21 132:11, 17, 20, 21, 22 133:5, 14, 15, 25 crane 51:2 crazy 64:22 crime 78:5, 7, 9 90:4 94:7 147:7, 10 148:14 151:7, 10 152:11 crimes 89:14 criminal 137:17 145:21 154:21 crimping 51:7 Cross 3:1 130:20 crossed 88:8 CSR 1:25 159:1 160:20 current 31:6, 8 37:13 64:21, 23 116:21 currently 84:19 custody 14:16 17:1 95:22 102:17 103:9, 12 < D > DA 92:7 94:18 154:4 Dana 28:1, 8 110:12, 13, 15, 16 111:19 dangerous 87:24</p>	<p>date 35:9 60:5, 11 63:9 65:2 105:20 109:8, 9 112:13, 15 114:11 115:3 116:2, 3, 18, 19 123:9 159:1 dates 9:19, 22 145:6, 9 daughter 56:3 Dauphin 1:25 4:7 159:1 160:5, 20 day 21:14 31:12 33:8 37:9, 10 38:13 52:18, 19 67:22 91:7, 21, 23 112:4 114:15 133:13 148:7 158:18 160:7 days 44:21 50:9, 14, 15 52:16 55:3 day-to-day 14:25 21:9 deal 81:10 84:8 90:21 96:15 107:18 139:22, 23 144:14, 23, 24, 25 dealing 31:16 Deandrea 8:23 118:21 debt 123:2 124:18 125:7 DEFENDANT 2:6 65:16 93:21 102:6 113:21 Defendants 1:9, 13 2:1 defender 141:22 Defense 131:7 defined 123:18 DeLapp 33:8 34:1 35:19 36:10 93:7 105:18 115:12, 14 135:15 136:18, 23 142:13, 14, 15, 24 143:7, 8, 12, 24 145:12, 20, 23 146:4, 11, 17</p>	<p>147:6, 16 148:9, 25 149:14 154:8 Delayed 87:18 deli 55:18 delinquent 97:11 Demetra 7:17 75:25 Dennis 25:1 29:16 112:21 Department 39:17 44:2 66:2 69:13, 25 depends 123:5 depo 9:3 deposes 5:2 DEPOSITION 1:9 4:3 5:23 6:7 79:12 157:18 158:8 159:1 Derrick 42:4, 5 43:11 Derrick's 42:7 describe 14:23 73:8 139:17 147:7 descriptive 94:24 deserves 59:7 desk 52:7, 16 53:13 detail 37:18 detained 24:14 39:12 40:20 72:8, 14 133:13 detector 32:9 detector 32:2 63:18 Detention 18:24, 25 102:21 132:7, 11 134:1 determinations 76:7 Devan 2:6 5:6 18:11 41:6 72:25 76:11 78:14 79:8 81:15 88:4 97:22 104:5 123:16 124:10 130:6 131:4, 11 132:12 156:19 157:12</p>	<p>devan.pederson@o ag.ok.gov 2:11 difference 107:24 different 11:12 14:20 52:22 60:6 82:6 93:9 101:12 108:8 150:12 digital 136:15 Dina 110:12 dip 49:3 51:3 dipped 49:6 Direct 3:1 5:4 discharged 24:20 45:5 Disclosures 76:15 Discovery 113:22 discussing 107:5 135:8 Discussion 130:19 136:6, 18 138:13 145:24 147:12 discussions 81:20 137:5 138:22 139:15 141:17 dismiss 86:9 dispute 140:21 DISTRICT 1:1, 2 76:8 94:12, 16, 19 154:4 dive 79:9 DOC 29:12, 21 41:25 42:6, 11 docket 76:8 154:1 docs 79:9 doctor 85:7 document 65:8 76:13 80:6, 19 81:6 83:15, 17 87:1 88:5, 6, 9 89:8 95:2, 3 98:19 100:2, 11 103:2 104:2 105:8 113:3 115:19 117:7 documentation 129:7 documents 65:11 79:5, 10, 17 80:2 91:15</p>
--	---	--	---

<p>doing 5:20, 24 21:9 43:8 51:19 53:21, 22 56:8 57:11 58:15 94:24 129:24 155:4 Dollar 26:24 27:4, 14, 16, 19 28:4 dollars 31:5 door 44:12 doubled 129:21 dozen 22:7 drilled 97:19 driver 70:11 drive-throughs 70:24 driving 39:23 66:5, 13 Drizze 8:23 118:20 dropped 117:17 due 114:12 121:7 128:15 duly 5:2 160:7 duty 67:1</p> <p>< E > earlier 91:8 105:24 114:25 138:3 early 28:19 149:5, 7 east 8:11 eat 66:16 education 12:9 24:1 eight 46:12 eighth 11:24 12:1 either 21:5 34:2 37:20 72:15 75:15 115:14 129:25 135:9 136:18 150:15, 22 Elementary 8:10 Eleven 7:12 else's 120:15 email 79:12 81:18 employ 117:14</p>	<p>employed 59:8 117:16 employees 42:11 Employer 112:25 117:12, 13 employers 22:2 58:17 employment 14:17 22:2 23:2 25:7 27:10 59:19 74:20 ended 58:5 enforcement 39:13 43:25 69:17 enter 145:17 entered 110:4 138:9 144:2, 4, 8 148:11 155:21 entering 95:4 148:15 entire 133:20, 22 134:11 entirety 158:8 Entrees 48:12 55:11, 16 ERRATA 159:1 especially 141:7 et 1:2, 8 103:19 evaluation 85:14 evaluations 85:11 event 77:23 78:2, 21 93:23 160:7 events 131:24 141:2 everybody 7:2 59:7 157:17 evidence 93:14 135:21 136:4 exactly 28:8 110:14 125:2, 3 Examination 3:1 5:4 130:20 example 49:17 excuse 5:10 123:14 exercised 15:9 Exhibit 3:1 105:24, 25 106:14</p>	<p>107:23 109:17 145:5 149:9 EXHIBITS 3:1 expenses 122:13 experience 21:18 Expires 158:20 explain 30:19 135:16 explained 84:5 Express 58:19 59:12, 17, 23 147:16 extent 125:13 extradite 72:16</p> <p>< F > face 92:8 149:19 152:13 face-to-face 115:14 facility 14:19 19:1, 2 42:9 facing 139:18 fact 128:15 147:18 Facts 80:13 123:18 147:10 148:15 fails 65:16 failure 60:3 72:15 fair 38:15 125:14 137:24 141:12, 13 143:14 153:20 fake 155:14 false 74:1 83:20 102:4 Family 26:23 27:4, 14, 16 28:4 46:11 fans 54:12, 13 far 46:10 122:17 fast 48:18 fear 62:12 67:22 fearful 68:23 February 34:2 47:25 55:22, 23 56:16, 17</p>	<p>Federal 4:5 63:11 69:9 128:3, 5, 10 fee 105:3 feel 6:13 83:22 101:6 113:12 135:7 FEENSTRA 1:2 fees 89:18 99:11, 17 103:20, 21 121:4, 10, 17 122:9, 22 123:3 124:24 125:4, 22, 24 126:1 148:4 153:17 154:1 felony 87:6 138:1 felt 68:5 143:10, 23 female 52:2 fight 150:24 figure 44:21 49:18 file 44:5 80:14 109:19 117:9 filed 5:14 137:18 fill 57:17 filled 86:6 88:22 101:9 104:6 146:1 finally 88:17 find 21:11, 12 25:7 26:19 27:21 35:22 37:12 42:13 46:23 48:9 59:21 68:14 92:5 finding 47:11 fine 27:1 38:1 46:18 51:21 65:16 75:15 89:15 107:6 109:13 140:15 150:10 153:13 finer 28:2 31:6, 9 33:5, 16 36:16 37:14 38:22 41:3 58:23 60:3 61:8, 12 63:3 64:20 72:15 89:18, 21 99:5, 8, 10, 17</p>
---	---	---	---

103:18, 21 104:20 107:10, 25 109:18 110:12, 17 111:1 112:4, 7, 9, 12 115:22 116:1, 15, 17, 22 117:8 121:10, 20 122:9, 22 123:2 125:4, 22 126:1 129:12, 17 144:17 148:21 152:7 154:1 fingerprint 93:4 94:10 105:4 135:22, 23 136:5 142:7 fingerprinted 93:14 102:15 fingerprinting 147:18 finish 16:10, 11, 12 44:14 78:14 136:12 154:15, 16 finished 16:13 35:12 finishing 16:9 firearm 87:8 first 5:2 7:8, 10, 13, 20, 25 8:8 18:19 24:13 25:4 31:25 42:10 48:17 62:17 69:8 86:19, 22 88:13 89:1 109:24 113:22 123:17 132:1 133:17 137:9, 17 139:7 154:16 160:7 five 38:24 41:13, 17 55:4 69:11 70:14 73:18 74:5 88:12 89:14, 20 97:17 107:5 113:15 134:2, 5 149:2 151:20 five-year 97:14 107:25 149:10, 15 Five- year/1,000/250	98:15 fix 23:11 53:11 fixing 36:18 flat 45:16 129:8 floor 37:20, 21 flows 123:9 focus 154:2 focusing 84:11 folks 53:16 75:22 followed 68:5 follows 5:3 food 21:17, 20, 21 119:4, 18, 20 120:17 122:15 127:18 128:19 Forbes 110:13 foregoing 158:8 Forensics 105:3 forget 52:6 93:20 forgive 132:13 150:1 151:6 forgot 37:20 92:18 forklift 12:24 13:3, 8 14:12 53:23 Forklifting 12:15 form 83:8 84:12, 14 88:22 91:8, 21 98:12 101:10, 19, 20 103:16 125:12, 19 137:25 143:15, 16 154:24 155:3 formal 137:10 forth 119:5 forthcoming 100:10 found 71:19 73:13 93:16 Four 55:4 free 6:13 15:16 68:14 100:15 frequent 42:12 Frequently 42:12 67:6 Friday 30:11 friend 25:3 friends 42:23 friend's 59:5	front 32:19 136:21 143:2 145:16, 20 full 112:13 116:1 118:2 158:9 Fuller 31:15 funds 124:24 further 111:8 future 35:8 < G > gaining 13:10 gains 99:15 gallons 57:17, 18 Galvanizing 48:11, 15, 19, 22 gas 122:15 gate 24:21 GED 11:14 24:4 GENERAL 2:4, 9 gentleman 131:6 getting 6:19 22:13 30:8 50:6 52:12 54:22 68:5 69:4 110:8, 23 113:7, 13 127:6 141:20 Gilcrease 12:3 Gill 66:10, 12 G-i-l-l 66:12 Gilridge 29:12, 13, 23 30:2 41:23 42:2, 3, 6, 11 43:11 46:22 47:6 girlfriend 42:7 66:9 girls 17:7, 22, 23, 24 18:3, 4 give 16:17 34:23 35:8 49:15 59:6 60:9 61:5 64:18 94:25 99:16 119:17 120:22 121:8 128:18 given 5:23 6:1 60:8 126:21 158:10 giving 95:5	glass 32:2, 20 63:18 glasses 111:20 go 11:1, 8, 20 13:24 15:1, 2, 6, 16 18:1 23:17 24:8, 15, 23 26:9 28:15 29:11 30:4 31:12 32:1, 5 35:7 36:11 38:9, 13 39:7 40:19, 25 43:18 44:19 47:8 49:6 50:19, 25 51:2, 3, 12, 14, 17 52:23 54:13, 14 55:10 56:19 57:15 61:8 63:11 64:9 68:15 72:21 73:11 74:2 78:4, 9 79:3 80:4 81:16 82:10 84:12 91:11, 12, 14, 16 101:22 102:12, 14, 23 103:3 104:13, 15 111:4, 15 117:19, 23 118:9 125:15 127:22 128:12 132:12 134:3, 25 135:5 140:3, 8 142:10 144:5 145:12 146:21 149:16 153:25 155:3, 16 156:3, 24 157:13 goes 7:2 100:9 103:19 going 5:17 11:25 21:7 31:18 32:15 33:8, 10 40:13 41:7 44:19, 24 52:4 59:6 66:15 67:9 71:21 78:25 79:11 81:6, 11, 23 83:15 84:9, 10 88:4 89:18 90:3, 5, 6, 22 91:8 92:19 93:9 95:7, 17, 20, 21, 22
--	---	--	---

96:15 97:16, 20, 22 103:23 104:5, 20 106:3 107:10, 21 108:12, 13 110:16 111:9 113:5, 9 114:3 115:15 117:14 122:25 123:5 125:11 132:13 136:1 139:24 140:1, 20 141:12, 25 142:9 143:12, 17, 24 144:12, 13, 16 145:16, 24 150:11 151:3 153:10 155:24 good 9:10 18:17 35:25 41:16 75:18, 19 108:15 113:16 115:16 147:21 Google 69:3 71:18, 20, 22 go-round 77:14 gotcha 51:8 grade 10:1 11:2, 9, 21, 22, 24 12:1, 2 16:7, 13, 16 83:4 graduated 11:7, 17 12:21 23:23 grandma 38:12 grandmother 37:2 77:7 Granting 109:18 115:22 117:8 graph 13:21 Great 9:15 ground 131:4, 11 group 15:2, 3, 5, 6 groups 15:9 grow 84:10 growing 90:23 guards 42:6 guess 26:10 56:8 59:12 70:22 93:21 132:18 137:20 146:22 151:20 152:10	guessing 8:10 107:1 Guilty 80:13 87:23 91:1, 5 95:4, 9, 13 100:14 138:9 140:10 gun 86:24 93:5 94:10 102:15 105:4 135:22, 23 136:5 142:7 guns 39:20 40:3, 6 66:21, 24 67:18 68:10, 14 guy 136:3 guys 28:12 68:10 70:2 124:8 135:20, 22 156:18 gyms 54:13 < H > hair 92:10 111:19, 23, 25 half 7:12 29:20 49:8 54:20 126:11 hallway 91:18 132:3 139:22 144:22 Hamilton 8:9 hamstrung 143:11 hand 113:19 160:7 handcuff 34:16 handcuffs 38:6 handed 65:1 handles 57:14 handling 25:19 hands 40:10 143:23 handwriting 97:23 hang 49:18 50:25 53:25 105:11 113:4 127:6 hanging 49:5 happen 93:24 115:11 happened 18:22 20:24 66:7, 17	68:8 77:25 94:1, 6 103:13 106:15 115:7, 11 132:19 happening 33:10 hard 136:14 head 97:19 health 25:23 85:7 hear 6:8, 9 10:11 124:9 130:22 136:17 137:6 heard 45:7 73:8, 9 144:24 hearing 3:13 6:11 62:15, 17 112:3, 7, 13 116:2 145:12 147:3 hearings 153:24 154:3 Heat 48:12 52:24 54:8 heatstroke 51:11, 17 heavy 92:11 held 73:22 105:17 130:19 132:7, 9, 10, 16, 23 133:5, 10 help 83:14 119:13, 15 123:4 129:11, 16 131:23 153:16 helped 46:25 77:13 helpful 109:10 133:8 140:12 helping 10:18 hereinbefore 160:7 hereunto 160:7 hesitation 152:18 Hi 92:3 high 11:8, 19, 20 12:4, 5 highway 49:2, 3 hired 25:12 26:23 hiring 23:3, 5 27:6 59:4 history 16:18	21:13 22:10 hit 24:13 103:14 hold 28:21 31:18 32:15 123:14 125:11 holding 19:2 hole 18:1 home 17:9 18:8, 9 19:25 24:9 35:6 43:18 44:19 51:17 108:16 119:7 honestly 68:5 91:23 122:2, 8 143:25 145:14 hope 5:10 Hopefully 80:6 hospital 6:25 7:1 51:12, 14 58:14, 24 85:8 hot 50:11 51:10, 22 53:6 hour 26:14 34:8, 10, 22 36:12 41:8 113:6 hours 25:20 46:12, 13 49:23 50:4, 7 53:8 54:25 57:4 74:16 house 119:8, 9 housing 118:25 119:4 Huh 78:13 107:16 155:1 hundreds 50:10 hurry 93:6, 11 142:18 hygienes 119:2 122:15 < I > ice 33:10 69:22 70:3 ID 40:7, 8 illness 85:7, 8 impression 13:7 87:3 95:10, 11 incarcerated 108:3 114:15
--	---	--	---

<p>incarceration 15:22 140:14</p> <p>including 125:7, 22</p> <p>income 119:22</p> <p>incorrect 148:1</p> <p>independent 134:20</p> <p>INDEX 3:1</p> <p>Indian 55:6</p> <p>indigence 114:13</p> <p>Indigent 131:7</p> <p>Information 86:2 150:3</p> <p>Initial 76:15 112:17</p> <p>initialed 112:16</p> <p>initiate 43:3, 5</p> <p>innocent 94:10 135:24</p> <p>inquire 143:1</p> <p>inside 52:5 54:14</p> <p>insofar 140:14</p> <p>installment 114:10</p> <p>instance 50:21</p> <p>institution 17:13</p> <p>instructed 114:16</p> <p>insurance 25:24 51:15</p> <p>intake 44:18, 24</p> <p>interested 129:24 160:7</p> <p>Interrogatory 114:1, 2, 4</p> <p>interrupt 9:7 81:15</p> <p>introduced 92:24</p> <p>involved 6:4 147:11</p> <p>involves 87:20</p> <p>issue 117:4 125:14 140:20 147:18</p> <p>its 86:2 101:20 158:8</p> <p>< J ></p> <p>Jackson 8:23, 24 118:20</p>	<p>jail 11:10 21:2 23:16 33:24 34:6, 15 36:11 38:13 73:20 74:4 115:15 140:8 150:17</p> <p>Janet's 48:11 55:11, 16</p> <p>janitorial 58:15</p> <p>January 26:5 34:3 62:3 74:10 112:4, 8</p> <p>JARED 1:8</p> <p>Jeree 66:10, 13 67:16</p> <p>J-e-r-e-e 66:12</p> <p>job 13:9 16:24 21:10, 11, 12, 15 23:12, 13, 15 26:7, 8, 19 35:22 46:23, 24, 25 48:9 49:15, 19, 22 51:9, 19 52:25 53:4 54:6, 17, 18 55:8 57:9, 22 58:4, 5, 11, 13, 14, 20 59:6 61:25 74:20 110:9, 22 111:12 128:20 129:2, 19</p> <p>jobs 14:16 26:15 48:14 57:7 58:6, 9, 12, 16 61:20 74:21</p> <p>Jon 2:1 130:8, 18 148:1 152:12, 17 157:12</p> <p>jon.williford@oag.ok.gov 2:6</p> <p>Juan 53:20 54:4, 5</p> <p>Jude 142:15</p> <p>judge 30:21, 22, 23 31:1, 20, 21 32:11, 19 33:8, 25 35:19 36:10 63:3, 17, 21, 24 64:6, 7 77:15 78:17 105:18 114:9, 11, 13, 21 115:10, 11</p>	<p>116:24 128:6 134:3 135:9, 14 136:18, 23 137:1 142:12, 14, 23 143:7, 8, 12, 24 145:12, 20, 23 146:4, 11, 17 147:6, 16 148:8, 25 149:14 154:5 155:25 156:4</p> <p>JUDGES 2:6 5:13 128:5</p> <p>jump 131:12 151:3 153:22</p> <p>June 56:22, 23, 24</p> <p>JURAT 158:1</p> <p>juvenile 15:20, 21 16:6 87:7 97:10, 11, 14 99:1, 2, 9, 12, 19</p> <p>juveniles 99:15</p> <p>< K ></p> <p>Kamareanna 8:23 47:23</p> <p>Karen 1:25 4:6 159:1 160:5, 20</p> <p>Katrina 7:9</p> <p>keep 40:16 47:11 52:12 53:2, 3 70:5, 7 113:8 123:6 126:15</p> <p>keeping 29:3</p> <p>kept 17:23, 24 23:12 29:1 68:25 95:14, 15 108:10, 12 151:22</p> <p>Kevin 65:7 94:20 109:10</p> <p>kid 31:16 69:23 97:20 107:10 139:21 144:25</p> <p>kidding 78:7</p> <p>kids 11:24</p> <p>kill 17:24</p> <p>kind 12:13 13:14 15:17 16:15 17:13 19:1 23:25 49:14, 15 53:21</p>	<p>58:8 100:8, 16 120:9 131:23 140:24 143:11, 23 150:1</p> <p>King 119:23</p> <p>knew 36:22 56:2 68:1, 3 70:15</p> <p>Knikko 25:1 29:16, 19 112:21</p> <p>K-n-i-k-k-o 25:6</p> <p>know 5:20 9:24 10:17 17:20 22:21 25:4 26:1 29:13 30:17 32:25 33:25 34:13 36:20 37:5 38:22 39:18 40:11, 12 41:4 43:13, 14, 17 44:25 45:9 46:9, 10, 11, 14, 20 47:16 54:3, 4 56:5, 6, 7, 8, 22 58:22 60:20 63:9, 12, 22 65:18 66:4 67:8 68:2, 3 69:3, 21 71:11 75:7 77:2, 5, 6 83:16, 20, 25 84:1 88:7 89:3, 4, 17 90:24 91:24 93:22 94:25 95:1, 19 97:7 98:10, 11 99:7 101:3, 7 106:8 108:10, 22 109:8 110:14 111:21 114:5 116:24 118:4 119:16, 19 120:4 122:2, 8 125:2, 3 126:16, 18, 19 128:18 130:8 131:16, 17, 20 132:14 133:12 134:8, 13 136:15, 25 137:18, 21, 22 138:18, 20 139:9, 12, 13 140:11, 22 141:2, 13, 23</p>
--	---	---	---

<p>143:25 144:10, 19 145:2 146:9, 10 147:17 148:1, 6, 15, 20 150:25 151:19, 21 153:7 155:13, 20 156:18 knowledge 10:17 36:17 134:7 knowledgeable 135:10 Koonce 42:4, 5 43:10, 16, 22 44:5 45:25 Kristi 36:7, 8, 9 80:21 82:18 92:2, 23 95:15 107:9 142:21 144:4 150:20 151:11, 12, 13, 23</p> <p>< L > Labeling 57:12, 19 Lacovara 1:19 72:24 81:15, 17 104:5, 11 109:10 113:5, 12, 17 123:14, 21 124:2, 5, 11 125:11 126:3 127:4, 10, 20 130:6, 15, 18 140:11, 19 141:1 143:15 147:25 148:6 152:12, 15 154:24 155:2 156:25 157:7, 17 lady 44:11 91:18 93:1, 16, 19, 23 110:13 111:17 Lakendra 8:22 76:3, 23 late 148:6 LATHAM 1:20 laugh 71:3 laughed 66:20 68:9 law 39:13 43:25 69:17 lawsuit 5:14, 18</p>	<p>71:6, 25 128:10 lawsuits 6:5 lawyer 80:23 81:21 128:1 146:18 155:5 lawyer's 80:21 82:17 learn 12:14 13:21 14:7 leave 27:3 32:17 51:9 53:1 55:8 117:19, 23 128:11 led 131:24 ledger 126:14 left 17:8 21:8 23:16 26:6 31:19 35:5 42:1, 9 44:22 52:25 53:6, 9 62:11, 21 64:7 65:24 67:22 119:3, 17 121:25 122:1 125:2 127:17 legs 113:10 LeiLani 76:25 77:2 length 98:4 Lessie 77:6, 19 78:1 level 45:20 licenses 12:23 lie 153:10 life 62:12 67:23 89:15 96:16 108:16 125:10 149:19 157:4 lifted 31:2 118:12 lifting 53:24 light 50:23 lightly 69:23 71:4, 12 72:2 lilia.vazova@lw.co m 1:23 limited 123:3 Linda 113:22 line 127:5 159:6 listed 75:23 literally 92:22 135:6</p>	<p>little 6:19 11:25 12:7 13:16 18:15 23:14 58:2 80:9, 12 90:20 91:16 92:11 113:7 120:19 131:12 132:14 143:11, 12 live 6:23 7:4, 13, 18 8:12, 16 9:22 10:3, 7 24:25 29:22, 23 47:5, 20 79:4 118:17 119:24 125:10 lived 6:24 7:6, 22 8:3, 6, 20 9:19 20:11 22:3 25:8 47:21 living 118:15 119:6 122:18 location 62:7 lock 51:1 locked 20:14, 23 96:19 97:17 long 6:23 10:7 12:17 17:10 19:3 20:13, 16 21:4 26:2 29:23 34:6 40:20 41:11 44:8 47:20 48:6 49:7 54:16 55:19 56:1, 21 57:22 68:16, 18 81:11 84:9 103:3 121:19 132:15 133:10, 16 146:9 longer 60:21 75:11 134:6 look 21:16 23:10 27:10 46:25 58:6, 8 59:19 79:20 89:2 91:14 92:9 95:24 96:20 109:23 134:16 looked 31:15 43:19 111:17 115:21 137:25 138:13 145:4 149:9</p>	<p>looking 21:15 39:20 40:3, 5 66:21, 23 67:18 68:9 74:19, 20 91:22 100:3 101:18 104:8 105:23 109:3 145:8 152:13 156:25 looks 65:5, 14 105:16 106:3 110:1 112:16 113:6 157:1 loop 50:24 loose 50:20 lot 37:22 42:15 131:4 132:25 loud 90:9 Louisiana 6:25 7:6 46:11 62:8 118:15, 16 126:24 lower 123:7 luck 35:25 115:16 147:21</p> <p>< M > ma'am 9:4, 5, 8 Mabel 11:18 16:2, 6 17:6 23:18, 19, 23 24:1, 7, 11, 16, 22 29:14 41:24, 25 42:1, 24 43:4, 16 44:4 45:24 60:25 99:19 machine 57:13 machines 14:6, 7, 13 Maddie 61:9 Madison 29:12 43:10 major 45:23 making 26:12 28:25 29:1 49:11 57:18, 20, 21 62:5 74:13 123:1 127:16 128:16 129:3, 4</p>
--	---	--	--

man 45:10 52:1
59:22 70:4, 6
management 14:4
manager 23:3, 5
27:6 28:4 59:4
Manor 20:10, 13,
19 22:3, 6
manufacturing
12:15 14:5, 10
March 48:3
Margo 77:14, 19
78:16
mark 84:14
86:17 89:10
105:22, 24 109:17
marked 81:14
82:14 84:22 85:3,
9, 16 88:15, 16
89:1 101:2, 3, 14
102:8 106:14
markings 89:7
mask 5:7, 8
material 13:18, 20
math 16:18
matter 41:14
matters 76:6
McDonald's
61:24 62:2, 7
74:11, 14 122:17
McLain 12:4, 5
mean 13:8 16:17
27:22 35:8 42:19
45:17 52:14
60:18 77:24 81:8
90:19 105:1
106:25 119:16
129:1 135:16
138:17, 18 139:4
141:6, 7 142:12,
22 151:15
meaning 12:1
151:16
means 95:9
144:10 155:22
meant 36:22
measurements
13:16, 22
Meats 48:11

55:11, 16
medication 85:2
medications 84:20
meet 41:23 91:10
130:25 133:23
134:11 136:23
137:2 144:20
memory 134:20
138:15 141:6
mental 85:7, 8
mention 141:18
mentioned 14:12
138:1
messed 40:12
messing 123:6
met 42:7, 8 63:11
131:21 132:1
134:1, 14 145:2
146:16
metal 32:1, 9
63:18
Mexican 54:4
Mexicans 53:19
Michael 1:19
156:23
michael.lacovara@
lw.com 1:22
Middle 8:9 12:3
26:4
mid-thirties 92:14
mild 51:16
mile 122:19, 20
military 43:24
mind 68:11 150:5
mine 25:3
minimum 87:25
minute 65:15
115:18
minutes 34:7, 10,
22 36:11 40:21,
22 41:7, 13, 17
68:17 75:10, 16
79:12 113:16
127:2 134:3, 6
156:24
misheard 153:14
missing 53:8
Mississippi 6:22

mistake 40:19
mistaken 111:20
mix-up 40:12
Mohawk 20:10,
13, 19 22:3, 6
mom 7:23 10:17
20:12 34:11, 13
76:19 109:7
118:17 119:11, 12,
13, 15 120:5, 23
128:18 144:23
145:1 150:16
154:7, 9 155:9
moment 28:22
66:9 91:13
109:23 155:5
mom's 119:22
Monday 28:15
money 29:3 30:6,
8, 10, 11 31:4, 9
32:6, 14 33:17, 21
34:12 35:14 37:2
38:1 39:9 56:14
63:24 64:9 78:10,
25 79:2 99:16, 21
111:3 113:2
115:15 119:3, 17
124:25 126:10, 12,
17 128:19 155:13,
14
month 25:12
28:17 29:5, 19
30:14 31:10 37:3
54:20 75:4 77:24
110:2, 3, 8 111:7
114:12 120:11, 18
122:22 123:8
124:16 125:9
126:1 128:13, 14,
25 129:17
monthly 114:10
122:14 123:3
months 17:12
20:19, 21, 22
29:20 45:15 49:8
54:19 90:4, 6
97:17, 20 121:5
122:7 129:18

149:2, 3 151:17,
18, 21
mopping 58:14
mother 7:15 8:17
36:13 76:1, 2
108:21 144:20
motors 54:12
mouth 82:7
142:21
move 7:8 27:13
62:9 86:8 106:9,
10
moved 7:10, 14
8:8 17:5, 6, 18, 19,
21 18:2, 3, 4
26:21 29:15, 18,
21 46:11, 22
47:12, 14 48:3, 5,
8 69:6 73:18
74:6
multiple 83:11
murder 93:8
142:8, 9, 17

< N >

Naik 1:19 9:9, 15
18:11 41:6, 12, 16,
19 65:7 75:13, 16
76:11, 16 78:14
79:8, 14 80:1
88:4 97:22 100:7
136:11 143:16
156:23
name 5:6 7:16,
20 20:8 25:5
27:7 28:1 36:20
37:23, 24 40:7
49:9 54:1, 5 55:5,
6 67:13 71:18, 19,
20, 22 77:4 80:21
82:11, 17 89:9, 11
92:8 101:11
112:25 117:12
120:14, 16
named 77:2
131:6
names 53:16, 19,
20 75:22

<p>nature 85:19 NE 2:4, 9 nearly 131:4 necessarily 81:22 necessities 119:3 120:21 127:18 128:17 need 6:14, 16 9:14 10:13 13:4 31:3 38:3 40:16 64:8 69:22 70:3 73:1 90:8 112:11 115:25 127:12 needed 12:20 28:11 30:20 37:15 77:16 114:21 Nehemiah 8:24 118:20 never 6:24 24:13 33:3, 4 36:2 53:12 58:16 60:4, 5, 7 63:9, 17 70:10 71:9 72:3 73:19 74:3 75:7 87:10, 13, 15 93:18 96:4 101:9 103:14 104:25 116:23 133:25 134:6 136:20, 22 140:17 142:1 143:1 146:2 147:20 148:9, 10, 18 New 1:21 24:15 44:25 65:2 112:15 114:16 116:3, 19 123:9 news 69:3 nickel 113:14 night 45:3 103:12 nine 46:13 141:2 ninth 11:20, 22 12:2 16:9, 10, 13, 16 83:5 Non 109:19 nonviolent 45:15 normal 125:10</p>	<p>Norman 17:8 NORTHERN 1:2 Nos 101:1, 3 Notary 158:16, 20 note 88:6 noted 158:12 notice 4:4 65:2, 13 111:9 noticed 79:14 NOVEMBER 1:13 4:6 25:14, 16 26:4, 8 48:7, 9 61:10, 11 62:11, 14, 20, 21, 22 63:6 65:5, 21, 24 66:1 67:15 68:21 69:10 159:1 160:7 number 60:6, 12, 16, 21 61:2, 5, 7 82:10, 21 83:7 84:13, 19 85:1, 6, 16, 18 86:1, 7, 12 87:5 88:25 89:13 90:1, 7 95:3, 24 98:3 100:13 112:24 114:3, 4, 6 numbers 42:16 60:8, 9, 23 79:15, 20, 22 104:6 nurse 29:12, 21 41:24, 25</p> <p>< O > oath 6:1 158:7 object 125:12 143:15 155:2 objected 125:19 Objection 72:24 125:15 126:3 143:16 154:24 Objections 113:21 obviously 113:13 125:13 141:2 occurred 106:4 115:4 147:11 October 25:15 47:22, 24 48:2 55:21, 23 56:16,</p>	<p>17, 23, 24, 25 58:5 62:16, 25 63:13 64:17 69:10 99:4 103:13 109:20 odd 104:13 offender 15:2, 5, 6 22:23 97:12 132:25 137:8, 15 144:2 149:1 150:6 152:1 offense 87:23 offer 87:21 Offered 68:1 150:4 offering 25:25 offers 22:8 office 5:8 94:12 officer 43:22, 24 67:4, 17 officers 69:18 oh 12:25 13:20 16:4, 11 18:7 21:21 24:12 26:2 52:19, 25 56:1 60:14 65:23 67:19 103:4 109:7 122:20 OIDS 2:1 81:20 OJA 11:11, 13 14:15, 19 15:24 17:1 95:22 102:17 OK 2:5, 10 Okay 6:18 7:3 9:12, 15, 17 10:5, 9, 19, 20, 23 11:1, 5, 23 13:7 14:6, 22 15:14, 21 18:5, 9 19:5, 7, 18 20:23 21:21 24:12, 19 26:2, 6 32:18, 22 34:19 36:23 37:19 39:10 41:6, 16, 19 42:12 43:15 45:24 46:8, 17, 21 47:14 48:1, 5, 16 50:2, 8, 15 51:5, 8, 18 52:21, 25 53:4</p>	<p>54:6 56:16, 18, 24 61:14 62:13, 22 66:13 67:15 71:22 74:9 75:16 76:16 77:8 78:12 79:7, 14 80:1, 5, 8 82:3, 9, 17 83:17 84:11 85:16 86:7, 12 87:12 88:11 90:12 91:15 99:24 100:2, 12 102:22, 25 104:2 105:10, 13, 22 106:11, 12 107:21 109:14, 25 111:14 112:19 113:3, 11, 17 114:6, 7 115:6, 10 116:8 117:11 118:22 122:1, 20 125:17 127:8, 15, 20 128:16 129:24 130:24 131:8, 9, 18, 23 132:23 133:3, 8, 16 134:10, 16 135:16 136:6, 13, 21 137:2, 8, 22 138:19 139:6, 10, 14 141:15, 21 142:15, 19, 22 143:4, 7 144:1 148:12, 20 149:22 150:13 151:3 152:11, 14 153:9 154:2, 7, 11, 17, 18 155:10 157:12, 17 OKC 27:21, 23 43:25 47:12 126:17 OKLAHOMA 1:2 2:4, 5, 9, 10 7:7 10:6 17:8 20:2 24:24, 25 25:8 27:3, 11, 15 44:1 58:4, 12 65:24 112:23 131:7 154:20 158:3, 17 160:1, 3, 7</p>
--	---	---	--

<p>old 7:10 19:14, 17 23:19 60:21 92:13 111:21 126:8</p> <p>older 11:25</p> <p>omission 104:13</p> <p>once 13:5 43:4 51:1 101:9 143:1</p> <p>ones 14:20 79:21, 22 153:25</p> <p>on-the-record 109:12</p> <p>Ooh 49:25</p> <p>open 59:15</p> <p>opened 55:21 121:8</p> <p>opening 52:11</p> <p>Operating 13:8</p> <p>opportunity 128:1</p> <p>Order 3:14 29:3 31:1 109:17 110:4, 5 112:6 114:9 115:22 117:8 126:12, 17</p> <p>ordered 63:2, 6 112:3</p> <p>orders 126:10</p> <p>orientation 117:18, 20, 23</p> <p>original 105:23</p> <p>OSHA 13:16</p> <p>ounce 148:9</p> <p>outline 139:16</p> <p>outside 6:2 53:15 136:24 137:3</p> <p>outstanding 26:25 27:5</p> <p>owe 121:16 122:9 124:21, 25 125:4</p> <p>owed 121:22</p> <p>Ozark 57:16</p> <p>< P ></p> <p>p.m 75:20 112:5 113:18 114:22 115:7 127:9 157:18</p>	<p>Pack 115:16 147:22</p> <p>Package 25:19</p> <p>pads 120:22</p> <p>Page 3:1 101:18 104:8 106:1 108:17, 18 113:25 159:6</p> <p>paid 23:13, 14 30:11, 12, 13, 14 31:5 32:22 34:13 35:20 37:1, 2 54:22 61:12 63:1 64:12, 13, 14, 18 112:9, 13 114:14 116:1, 10 117:21 118:10 121:1 141:18, 20, 25</p> <p>pain 128:12</p> <p>paper 65:3, 4 95:21 102:9 111:15</p> <p>papers 18:8 35:17</p> <p>paperwork 64:18 86:6 94:21, 25 145:25 146:5, 18, 22 149:8</p> <p>par 22:11</p> <p>Paragraph 96:20 109:24 112:2, 12 115:25</p> <p>Park 8:13 9:19, 23</p> <p>Parker 48:13 57:10, 11</p> <p>parking 109:4</p> <p>parole 44:10, 11</p> <p>part 8:7 11:15 13:10 14:10, 11 155:13</p> <p>particular 13:9 22:1 76:12 110:5 145:20</p> <p>parties 160:7</p> <p>part-time 57:6</p> <p>pass 11:13, 16 12:20</p> <p>passed 12:21</p>	<p>passenger 39:24 70:11, 12</p> <p>patience 157:10</p> <p>patient 73:1</p> <p>patrol 67:12</p> <p>pay 28:12, 15 31:3 32:5, 14 33:16 34:12 36:24 38:11 39:8 56:2 61:8, 19 63:13, 24 64:3, 10, 16 72:15 76:7 77:13, 16 78:18 99:15 103:24 104:21 107:11 109:18 110:7, 9, 10, 18, 21, 24 111:2 113:2 114:12, 21 115:6, 22 116:6, 25 117:3, 8 118:9 119:13, 15 120:11, 17, 20 121:10 122:21 123:13, 23, 24, 25 125:9 127:15, 16 128:20, 25 129:2, 5, 6, 9, 10, 12, 17 153:16 154:8</p> <p>paycheck 56:3, 4, 10</p> <p>paying 29:3 30:9, 17 99:18 116:15, 17, 21 120:5 121:12, 14 124:6</p> <p>payment 31:24 33:19 99:21 109:19 110:17 111:6 114:16 122:4 125:24</p> <p>payments 28:24 29:1 110:1 118:25 121:3 123:3, 8 126:8</p> <p>Pederson 2:6 3:1 5:5 9:4, 18 10:15 15:11 18:16, 18 41:9, 18, 21, 22 65:10, 14 73:6, 15</p>	<p>75:9, 21 76:14, 17, 18 78:16 79:13, 19 80:3, 5 81:16 82:3, 4 88:11, 12 98:1, 2 100:13 104:14 109:14, 16 113:11, 15, 19 123:19, 23 124:3, 13, 19 125:18 126:7 127:1, 23 130:2, 17 145:5 157:16</p> <p>pen 102:8 112:22</p> <p>penitentiary 10:25 39:2 81:12 84:9, 10 90:23 96:17 99:3 129:22 139:25</p> <p>people 5:9 17:16 31:23 33:13 37:22 70:14</p> <p>people's 70:10</p> <p>Peoria 70:21</p> <p>Pepsi 58:11, 13, 20 59:9</p> <p>percent 88:1, 3 90:5 150:10 151:7, 9</p> <p>percentage 99:14, 16</p> <p>percentages 99:20</p> <p>perfect 45:17</p> <p>period 129:18</p> <p>periodic 97:12</p> <p>perjury 102:3</p> <p>permits 12:23</p> <p>perpetuity 124:2, 5</p> <p>person 10:11, 14 24:15 33:14 38:4 44:25 46:15 59:9 92:5 94:3 111:1</p> <p>Personnel 59:17</p> <p>person's 27:7</p> <p>pertain 85:11</p> <p>pertaining 109:9</p> <p>Peterson 5:6</p> <p>phone 42:16 60:12, 21, 23 64:3,</p>
---	--	---	---

<p>5 112:24 117:1 120:7, 9, 12, 20 122:15 128:16 129:5, 6 physically 132:2 picked 152:5 Pie 117:14, 19 place 11:12 38:20 116:15 158:11 places 18:14 21:18, 20, 21 22:5 55:12 58:8 Plains 17:7, 11, 15 18:6 19:16, 20, 23, 25 20:18 21:8 Plaintiff 1:2 79:23, 24 93:21 113:20 114:11, 14, 16 128:4 157:8 PLAINTIFFS 1:18 Plaintiff's 76:14 114:10 plan 33:19 110:17 111:6 114:17 120:15 plans 31:24 Plastic 57:10, 11 Plastics 48:14 playing 14:18 plays 140:24 Plea 3:12 80:13 81:1 87:23 90:17, 24 91:21 95:2, 4, 8, 17 97:2, 5, 9 98:3 100:2 103:15 104:7 105:20, 23 107:17 137:25 138:9 140:14 144:3, 5, 9 145:4, 17, 24 148:3, 12, 16 149:9 150:18 155:18 156:3, 9, 12 plead 91:3 100:14 pleading 95:12 97:6 154:21</p>	<p>please 6:12 125:15 141:10 plus 103:24 point 18:17 33:1 149:14 pointed 145:5 pole 50:22, 23 poles 49:2 53:24 police 34:17 39:16, 17 44:1 66:2 67:4 69:12, 16, 25 70:17, 20, 24 popped 67:13 117:15, 18 portion 109:12 position 51:24 52:3 140:25 possession 87:7 possibility 150:18 possible 18:12 35:2 65:1 75:23 106:23 132:14 possibly 63:22 89:1 122:10 potential 139:17 potentially 149:19 prepared 109:11 124:12 135:1, 10 140:12 prepped 14:6 prescribed 85:1 presence 136:24 137:3 present 76:19 77:8, 20 presented 92:17 pretty 35:4 51:6 52:23 66:25 71:10 72:14 83:16 84:7 90:20 91:4 93:10 108:13 116:22 127:6 131:3 previously 73:10 87:5 114:20 prior 14:17 103:7 138:1, 14, 16</p>	<p>prison 60:10, 13 72:6 108:13, 14 110:7 140:3 149:20 prisoner 15:20 privilege 81:20, 24 probably 10:17 20:21 29:19 34:7 38:24 45:18 54:20 68:17 probation 44:11 Procedure 4:6 proceeding 106:16 proceedings 84:21 85:20 105:17 106:22 process 31:23 44:10 processed 97:11 produced 79:16, 17, 24 professional 85:7 program 12:14, 17, 18 13:10 15:25 23:23 87:18, 19 promise 153:23 proper 14:8 123:22 property 87:8 propounded 5:3 prosecuted 102:3 prosecuting 136:19 156:5 prosecutor 135:9 136:24 154:4 provide 13:14 25:23 public 141:22 158:16, 20 pull 40:15 104:15 pulled 38:23 39:25 40:1 44:18 51:1 62:10, 11, 13, 20 65:20, 21 66:1, 3, 19 67:1, 6, 7, 8, 9, 12, 16, 25 69:4, 5, 10, 18 70:5, 8, 14 71:2, 9, 24</p>	<p>72:3, 8, 13, 18 73:10, 19, 22 74:5 113:20 pulling 67:2, 11 70:5, 7 punishment 89:14 139:17 pursuant 4:5 160:7 put 16:7 23:7 38:6 40:9 44:24 50:22, 24, 25 53:13, 14 54:14 81:14, 17 82:7 83:12 95:7 96:8 99:21 119:19, 20 147:14 155:12 putting 57:13 119:19 < Q > question 6:13 18:12 73:3, 16 74:3 78:8 79:8 83:22 90:13 96:23 101:13 114:3 125:12, 19, 20, 21 126:5 127:12 129:15 131:14 136:12 143:21 150:1 152:19, 21, 24 154:15, 25 questions 5:3, 18 35:21 81:25 83:18 100:8, 9 102:10 107:23 130:3, 8 131:1 140:20 145:25 146:3 156:17 157:8 quick 18:11 91:14 130:7 quite 54:24 < R > ran 55:17 range 89:14</p>
---	--	--	--

<p>read 13:18 82:11 83:7, 10 84:13, 16 86:2 90:7, 8, 12 95:25 96:6 97:23, 24 98:24 106:2, 13 107:23 114:2 158:7 reading 65:8 76:13 83:21 96:21, 22, 23 102:10 107:4 108:1 114:6, 18 ready 106:8 114:5 real 54:17 91:14 really 36:2 56:5 138:18 147:20 reask 143:20 reason 26:6 43:14 70:13 71:24 77:12 131:16 132:16 recall 10:24 12:11 13:10 17:11 21:16 23:11 26:12 34:25 35:1 55:5 61:16 76:20 81:6, 9 86:10, 11 90:2 97:15 101:24 108:1 110:4, 14 118:13, 14 121:18 122:5, 8 126:16 131:22 138:12, 17 139:4 145:14, 18, 19, 22 recalled 32:25 33:2 78:2 recalls 65:12 receipt 64:19, 25 65:4 receipts 29:2, 3 126:8, 11, 17, 20 receive 12:22 received 86:1 receiving 118:25 recollection 20:16 47:15 78:21</p>	<p>101:14 106:15 121:21 recommend 155:25 156:6 recommendations 138:23 record 18:13 41:21 81:18 82:2, 21 88:6 104:11 124:7 127:21 130:7, 16, 19 156:24 157:13, 15 recorded 126:15 records 134:17 recurring 116:9 122:14 Red 112:1 reddish 92:11 Reece 53:18 referring 76:12 refresh 138:15 regard 13:15 related 86:7 relates 140:15 relating 76:6 relative 160:7 released 18:5 43:15 44:9 60:10, 13, 24 72:5 103:7 relevance 81:23 remained 103:9 remember 7:25 8:3, 6 9:24 10:1, 18, 21, 22 13:1 20:3, 5, 8 21:23 22:1, 16, 25 23:6, 7 25:12 27:7, 24 28:1, 9, 17, 20, 22 31:22 32:22 34:5 35:3 49:9, 11 53:16, 19, 20 54:2, 3, 21 55:7 56:10 57:1 59:2, 9 60:15 63:15 72:10 76:10 80:18 91:23 92:8 96:21, 25 98:7, 25 107:2, 7, 21 110:14 111:17</p>	<p>118:10 133:16 138:5 141:10, 11, 24 145:8, 11, 16, 23 146:14 147:1 148:18, 24 149:11, 12 151:6 remembers 78:24 Remind 41:22 reminder 9:10 rendition 109:12 renew 13:4, 6 rent 118:24 119:11, 13, 15, 20 120:4 renting 119:12 repeat 8:5 111:24 137:12 152:22 156:1 rephrase 131:17 reply 5:3 REPORTED 1:25 159:1 Reporter 4:7 6:2 9:2, 6, 11, 13, 16 10:10 15:3 82:22 83:2 92:19 124:7 154:9 157:9 160:6 represent 5:13 80:2 131:6 133:11 representation 130:7 representing 154:12, 20 requesting 97:13, 14 required 87:24 112:6 requirement 129:12, 17 Requiring 109:19 respect 148:10 response 86:4 113:25 114:4, 13 Responses 113:21 responsibility 155:12</p>	<p>rest 44:14 56:13 96:15 120:23 restate 6:13 result 12:22 resulted 152:8 review 63:3 65:17 reviews 97:12 revoked 152:9 153:1, 4, 6 revoking 150:18 rid 129:16 ride 27:21 28:13 29:10 30:4 47:1, 6 119:5 rides 47:12 right 6:9 8:25 19:10 24:21 28:5, 18 32:3, 4, 7 33:18 37:16 38:18 42:20 44:3 46:16 53:7 55:7 57:1 60:1, 16 63:7 74:7, 25 75:1 78:7 82:15 83:2 86:5, 6 89:8 91:22 92:22 95:16 96:19 98:15 102:17, 22, 25 104:9 105:10 106:25 107:3 112:23 115:18 117:7 120:7 122:23 124:22, 25 125:5 126:23 127:1, 2, 3 128:7, 23 130:2 133:20 134:23 135:5 137:6 139:8, 15 140:1, 5, 9 141:1 144:3, 19 152:4, 9 153:18, 22 155:15 156:8 rights 90:14 95:5 ring 109:5 138:15 risk 149:23 robbery 86:13, 21 87:2, 4, 24 room 10:14 107:9</p>
---	---	--	---

round 104:22
107:12
route 150:12
RPR 1:25 159:1
160:20
Rules 4:5
run 14:6, 7
runaround 117:1
rushing 142:4, 23,
24

< S >
safe 126:18
safety 13:20
Samsung 120:10
Sanders 36:8, 9
80:22 81:7 82:18
89:23 92:23, 25
93:2, 4, 15 95:15
98:8, 21, 23
101:23 103:22
131:25 132:2
133:24 136:7, 17
139:16 141:17
142:2, 21, 23
143:10, 23 144:4,
21 145:2 150:3,
16 151:11, 12, 13,
23 155:20
saved 30:10
saw 36:10 67:19
98:12, 18 104:8
152:18
saying 10:14
46:12 62:14 63:8
71:11 81:9, 14
83:17, 24 86:20
91:4, 5 94:25
107:22 108:5, 6,
10 116:8 124:9
128:19 140:18
147:4 151:22
says 5:2 65:15
67:17 76:5, 12
80:21 81:1 84:19
85:18 86:8, 15
87:7 88:5, 10
89:13 95:3 97:1,
2, 8, 10 98:3

100:13, 17 101:25
102:2 108:20, 24
109:1, 2 112:3, 11
113:1 114:8
115:24
School 8:10 11:1,
2, 7, 8, 17, 19, 20
12:3, 4, 5 15:1, 9,
24 83:5 87:8
120:1, 3 139:1
science 16:18
scrape 34:11
screen 67:13
105:14 115:20
screws 50:22, 23,
25
scroll 80:12 114:5
seal 160:7
search 68:11
Seasonal 26:5, 7
54:18 55:9
second 37:21
59:7 62:24 65:11
88:25 91:11
112:2 123:15
154:2
secondly 123:21
Sedrick 53:18
see 11:8, 16 18:1
30:21, 22, 23 31:1
32:11 37:13 45:4
63:21, 23 64:6
65:12 66:22 79:6
80:5, 7, 8, 10, 16
81:3 93:3 94:15
98:5, 16 101:17,
21 103:15 104:17
105:10, 13 106:6
108:18 109:21
110:16 112:2, 25
113:23 114:8, 18
115:20, 24 116:23
117:7 132:18
133:25 134:17
155:7
seeing 40:16
80:6 93:19
149:12

seen 45:9 67:2,
10 80:18 103:2
104:25 105:7
149:8
selected 58:18, 25
Seminole 10:4
send 139:24
sending 29:4
31:9 99:22
sense 56:18
131:15 138:19
sent 30:5 59:12
79:11 126:13
133:19
sentence 19:21
87:25 97:13, 14
99:9 107:24, 25
108:4, 7, 9, 11
140:15 149:15
152:9, 25 155:24
156:6
sentenced 95:17
102:16 103:1, 10
148:25
sentencing 76:7,
10, 19 77:9, 12
80:24 87:18, 19
93:25 102:24
104:18 105:20
106:22 144:17
September 19:4
80:15 105:17
114:8 115:4
117:9 145:7
serious 78:8
serve 87:25
151:25
service 60:22
services 58:15
set 33:18 113:22
114:16 123:18
160:7
setting 110:1, 17
114:10
seven 20:21
shackles 91:17
Shannon 7:19, 21
S-h-a-n-n-o-n 7:21

SHARONICA 1:9
4:4 5:1 9:9
10:16 41:12
75:13 78:14
82:12 100:7
108:24 109:2
113:20 123:15
124:19 125:15, 18
126:4 127:5, 10
136:11 148:2
152:13, 20 155:4
157:1, 3 158:6, 13
159:1
Sharonica's 18:13
sheet 13:18, 20,
21 159:1
sheriff 31:14
32:8 105:1
sheriffs 105:2
sheriff's 69:14
shifts 49:25 50:3,
16 55:2
shipped 18:23
19:19, 20 132:22
shoe 34:20
shoes 135:21
shop 12:16 13:12,
15
short 35:24
111:19 113:9
147:23
Shorthand 4:7
160:6, 7
show 62:25 65:9,
11 79:5 104:2
113:3
showed 14:10
showing 109:16
shows 88:7
siblings 8:19, 20
20:12 118:22
119:24
sic 17:25 36:20
side 8:9, 11 32:8
44:19 70:21
73:23 94:22
sidetracked
155:17

<p>SIGLER 1:8 5:14 77:15 78:17 114:9, 11, 13, 21 115:10 128:6 sign 44:13 101:10 111:15 signature 98:9, 10 102:5 signed 18:7 45:15 89:9, 11 95:20 114:9 simple 73:16 sir 5:12, 16, 22, 25 6:3, 6, 10, 15 7:24 8:2, 15 9:1, 21 12:6, 12, 21 13:11 14:14, 18 15:15, 18, 23 16:22, 25 19:11 21:3, 11, 22, 25 22:4, 9, 17, 24 24:6 25:9, 11 26:11, 17 27:6, 9, 12 28:6, 10, 25 29:8 30:1, 5 32:21 33:7, 22 34:17 35:5 36:8, 18 38:2, 8, 14, 17 39:24 40:2, 24 41:1, 5 42:21, 22, 25 43:2 44:7 45:14 46:4, 17, 19 47:3 48:10, 23 49:10, 17 50:17 52:20 55:17 56:25 58:7 59:18 61:1, 13, 22 62:15, 23 63:5, 8 65:3, 19 66:6, 14 67:5 68:22 70:17 71:7, 15 73:22 74:8, 12 76:4, 22, 24 77:3, 5, 10, 13, 18, 21 78:3, 19, 22 80:11, 17, 20, 25 81:4, 8 82:8, 20, 25 83:3, 6, 10, 16 88:20, 23 89:3, 6, 9, 12, 17, 25 92:17 93:2, 18 94:4 95:19 97:16</p>	<p>98:9, 13, 17, 22 99:13 100:4, 20 101:16 102:7, 14, 18, 20 103:8, 17 104:19 107:3, 19 108:2, 19, 25 109:22 110:19, 21 111:22 112:18 114:19, 23 115:2, 5, 13, 23 116:7, 14 117:6, 22 118:2, 6, 16, 18 120:6, 8, 16, 25 121:15, 18 122:12 126:10 127:14 128:2, 8, 15, 24 129:1, 9, 20 130:1, 23 131:2, 13, 19 132:6, 9 133:7 134:19, 22, 24 135:7, 15 136:8, 20 137:4, 7, 16 139:19 142:1, 6 145:10 146:24 147:9, 14, 20 148:23 149:21, 24 152:7 154:14 156:15, 22 sister 40:14 47:13, 18, 22 59:5 76:3 sit 37:23 91:17 126:2 153:10 156:9 sitting 32:8 40:21 94:21 situation 22:22 six 17:12 20:21 38:24 55:4 122:6 129:18 Sixth 10:2 skill 13:9 skills 13:9 sleep 15:12 slowly 9:10 152:18 small 7:1 68:1 96:6, 8 smaller 106:5</p>	<p>Smith 42:4, 5 43:11 smoking 45:22 smoothly 123:10 snappy 147:23 social 16:18 somebody 27:4 67:2, 11, 12 91:12 120:15 135:4, 6 150:17 155:14 soon 35:12 sorry 8:5 15:3 16:4 17:2 21:19 48:16 56:16 70:19 100:12 105:22 111:24 130:18, 24 147:25 152:12 sort 104:12 131:23 142:3 148:22 150:2 sought 22:2 sound 63:7 94:24 143:22 Sounds 41:16 107:4 143:10 source 119:22 Southern 17:7, 10, 15 18:6 19:16, 20, 23, 24 20:18 21:8 spar 72:25 speak 6:14 9:10 36:2 130:13 148:19 speaking 33:15 specifically 135:2 specifics 84:12 specify 22:14 speculate 123:18 spell 25:4 54:9 66:11 103:20 spellings 9:3, 14 157:11, 14 spend 81:11 84:9 90:22 96:15 108:13 119:4 144:13 split 91:10</p>	<p>spoke 130:11 spot 13:25 155:12 SS 158:3 160:3 stacked 99:13 129:21 stamp 80:14 stamped 109:20 117:9 stand 147:15 standing 99:21 start 6:19 111:10 122:25 131:10 started 21:17 25:9, 15 26:20 31:25 62:4 83:18 91:25 93:19 134:3 starts 114:2 STATE 2:6 86:8 97:13 154:13, 20 155:24 156:5 158:3, 6, 16 160:1, 6 stated 91:24 statement 92:21 94:2 100:6 statements 102:4 STATES 1:1 stay 15:11 20:13 24:16 44:14 45:10 46:24 48:6 127:5 stayed 19:13 45:20 47:23 57:25 70:17, 18, 20 staying 19:12 20:15 Steel 48:10, 15, 19, 22 50:12 step 37:17 Steven 42:4, 5 43:10, 15 Stigler 36:20 stipulate 109:11, 15 140:13 stipulated 4:3 STIPULATIONS 4:2 160:7</p>
---	---	---	---

stood 23:1 33:20
92:23
stop 67:16 68:4,
16, 18, 21, 24
70:16
stopped 39:13, 18
storm 33:10
story 56:1
straight 19:9
strange 150:1
Street 2:4, 9
109:3
streets 24:13
103:14
stretch 113:10
strike 46:6
strings 34:21
strip 49:3
stripped 34:20
studies 16:18
study 16:1
stuff 26:21 39:20
53:8, 24 67:14
102:8 119:4, 21
135:21 136:4
148:22
subject 87:17
subpoenas 79:23
Subscribed 158:15
substances 84:20
suffering 128:12
suicidal 17:16
Summary 80:13
90:20
supported 81:21
supposed 35:9
43:20 44:6, 15, 20
45:10, 13 56:9
Sure 18:16 30:5,
6 35:4 54:24
123:22 124:17
140:19 145:15
152:13, 19 156:3
suspend 129:11
suspended 108:3,
4, 11 149:10, 15
152:9, 25
Sutter 131:7, 21

switched 12:3
52:13 84:2
sworn 5:2
158:15 160:7
system 97:11
99:1, 2, 12 116:13
121:7 131:7

< T >
Taco 48:13
56:20, 21 57:8
58:3, 5, 9, 10 59:3
61:21, 25
take 6:16, 17
9:11 11:14, 15, 25
13:22 16:15 21:1
24:5 28:16 33:23
34:20 35:16
38:20 41:10, 11,
17 59:15 66:18
72:19 75:9 81:10
84:8 90:22 92:20
94:2 96:12, 13, 20
99:16 109:23
113:9, 15 117:16
118:7 127:2
139:23 140:4
142:22 144:13, 25
149:5 155:12
156:23
TAKEN 1:13 4:4
73:20 74:4 159:1
160:7
talk 5:19 15:7
30:2 31:21 63:14,
16 68:1 98:21, 23
103:21 128:1
135:5, 6 147:21
talked 16:1
27:24 28:7 42:10,
15 55:12 77:22
78:20 107:20
108:23, 25 140:23
146:15
talking 10:11
31:20, 23, 24 32:7
36:4 70:2 85:13
91:25 98:7 107:6,
23 108:7 114:25

124:8 132:25
133:22 134:4
137:14 140:6
141:2
talks 87:25
103:18
Tallulah 6:25
7:6 62:8 118:16
tampons 120:22
taught 13:18
teaching 16:23
tech 11:6, 7 12:8,
9, 13 16:2
technology 11:7,
15, 16, 17
tell 6:8 13:6
45:6 48:16 50:13
54:1 58:18, 24
66:7 78:23 84:14
89:23 90:9 91:7
92:25 93:15 94:8
95:25 111:8
139:12, 20 140:2
141:10 142:2
146:7, 11 147:16
148:13, 14 154:16
157:3
telling 32:12
64:8 71:11 93:10
94:22 95:12, 14,
15 100:22 108:12
temp 48:14
54:17 57:9
temperature 50:10
temporary 49:20
Tenth 11:4, 5, 9
16:12, 16
terminology 138:8
terms 84:17
138:8 140:20
144:16
test 11:14
testified 157:4
testify 76:6 160:7
testimony 6:1
73:2 81:23 138:5
158:10
tests 12:19

Thank 74:9 82:3
130:3, 4, 17, 24
133:9 156:21, 22
157:9
Thanks 9:7, 16
76:16 155:4
157:17
theirself 17:25
thin 69:22 70:3
thing 32:3 49:21
94:9 98:24
100:21, 24 101:10
102:7 116:9
144:15 147:4
155:5
things 10:18
12:13, 16, 19
13:19, 23 14:1, 8
15:7, 9 16:19
17:24 21:14
35:25 42:14
44:22 47:9 49:3,
4 51:4 55:18
57:14 72:2 73:11
82:5 83:24 93:14
107:22, 25 115:16
119:18 127:19
142:25 147:22
thingy 150:21
think 7:9 11:22,
23 13:17 17:8
21:5 22:5 25:14
26:4, 14 32:24
33:9 34:2, 14
36:19 37:3, 5, 7,
10 45:2, 11 47:16
50:6 54:23 59:4
60:3, 14 61:9
62:16 64:11, 13,
14 70:13 71:24
73:4, 24 79:21
85:13 86:20
92:10 93:8 94:11,
19 99:4, 6 101:12
103:4 106:17
108:17 121:22
122:6 123:11, 24
124:16, 17 127:6
138:3 140:24

147:14 148:2 149:8 152:23 156:16 157:1, 7, 12 thinking 45:13 Third 1:20 37:21 112:12 115:24 third-party 79:23 Thomas 5:13 63:4 113:22 128:6 thought 73:7, 9 79:19 97:6, 16 105:21 127:11 151:7 153:4, 7 three 43:11 50:14, 15 72:5 103:5 121:5, 9 128:5 tied 143:12, 23 tightens 51:3 time 7:14 8:4, 21 14:15, 17 20:1 21:7, 8 22:3, 13 23:2, 8 24:13 26:16 27:12 28:23 29:1, 2 31:10 34:23 35:2 36:4, 15 38:8, 16 39:11 42:3, 10, 20, 21 44:14 45:9, 16 47:5 48:8 50:13 56:15 57:8 61:17 62:10 64:10, 11, 14 65:2 66:22 67:1, 10, 12 69:7, 8, 14 71:2 72:13 73:25 76:10 77:8, 15, 17 80:23 81:11 84:9 86:25 91:9 94:17, 20, 21 96:18 97:5 99:20 102:16, 19 103:10, 23 104:7, 18 107:20 109:18 111:1 114:20 115:8, 11, 13, 22 117:8 122:3 124:8 129:6, 10	130:25 134:8, 13, 14 137:9 139:2, 23 141:16 144:11 145:23 146:9, 15 147:1 151:25 152:4 154:7 155:6 156:20 158:11 timeline 131:24 times 38:21, 24 41:2 69:5, 11 70:8, 15 71:10 72:18 73:18, 21 74:5 83:11 121:9 133:23 134:10 145:19 151:5 157:4 tired 113:7 141:3 157:1 titled 117:8 today 5:18, 21, 24 79:11 105:8 124:3 126:2 128:4, 10 131:1 132:15 133:1 156:8, 9, 11 told 11:14 12:10 22:9, 25 23:22 26:25 27:17 28:3, 10 29:22 30:20, 23, 25 32:10 33:7 35:22 36:20, 24 37:14 38:8, 24 40:14, 18 44:11, 18 46:24 47:2 51:16 58:21 59:10, 23 60:4, 5 61:18 63:16, 20, 23 64:5 70:4 72:1 73:25 74:22, 23 75:2 77:16, 20 79:1 83:10 84:5 85:22, 23, 24 86:17 88:2 90:3, 4 91:1, 6 92:15 93:1, 2, 4 94:9 95:7 97:21 99:25 100:5, 18, 19 101:5, 7 103:23	104:19, 23 106:21 107:14, 17 110:7, 18 111:3, 4, 6, 11 114:11, 13, 20, 25 115:6 116:24 117:15 118:8 135:19 136:2 138:3 140:4, 5 141:19 142:11, 20 144:7, 23 146:12, 15, 20 150:3, 9 151:5, 9, 12, 23 155:20 156:13 Tommy 53:18 toothbrush 115:16 147:22 toothpaste 120:22 total 125:7 tough 35:23, 25 111:13 157:5 town 7:1 8:7 traffic 67:16 68:4, 21, 24 70:16 training 12:8 13:14, 17 16:1 23:25 49:14, 16 52:13 transcribed 160:7 Transcript 3:13 105:16, 25 106:13, 21 108:5 138:14 transcription 106:4 158:10 transferred 95:23 Tread 69:22 70:3 71:3, 12 72:1 treated 85:6 treatment 85:14 trial 93:7 96:12, 13 102:13, 14 140:4 144:5 149:17, 19 trials 142:8, 9 tribal 55:6 trick 139:11 tried 10:16 23:12 36:5 51:25 53:14 58:10, 13, 14	74:21 75:7 121:6, 9 trouble 6:11 45:16, 20 72:4, 5, 6 true 82:11 83:20 101:25 138:4 158:9 truth 160:7 try 10:13 31:18 48:17 52:4, 9 58:20 64:3 72:25 73:16 75:12 83:14 96:6 114:1 119:5 124:20 125:20 131:17 137:13 141:14 143:20 152:23 153:11 trying 17:23, 24 21:11 23:12, 14 26:23 28:21 42:13 44:21 45:2 53:2, 3 79:5 93:6, 11 133:3 136:15 138:19 139:11 142:10, 18 143:9 153:20 Tulsa 7:7, 8, 10, 14 8:1, 4, 7, 11, 14 10:6 12:5 20:2, 25 21:1, 7 23:16 24:10 26:21 27:13, 22 29:4, 6, 9 30:9, 13 38:23 39:14, 15, 16, 17 47:13, 14 48:8 55:13 58:4 60:18 62:9 66:2 69:1, 6, 12, 14, 15, 25 70:22 73:19, 24, 25 74:6 87:8 105:1 121:12, 14, 16, 20 122:4, 10 124:21, 25 125:8, 23 152:5 153:2, 15 155:11 turn 27:19 28:11 64:16
--	---	--	---

<p>turned 19:22 45:6 146:25 twice 24:11 67:9 145:17 twist 50:20 twisting 49:1 50:18 51:6 two 9:25 29:20 33:13 36:19 45:19 49:8 57:23 58:2 60:24 61:4 74:21 77:25 103:5 120:1, 2, 3 123:1 127:2 145:6, 8 type 14:13 71:20</p> <p>< U > Uh-huh 55:14 82:16 104:4, 10 105:12 138:2 155:19 ultimate 125:14 ultimately 24:22 unable 114:12 116:6 underneath 98:14 undersigned 158:16 understand 5:15 6:12 7:3 14:2 26:9 83:7, 11, 13, 14 84:4, 6, 14, 17, 18, 21 85:18, 24 86:12, 25 87:17, 22 89:13, 19, 21, 22, 24 90:14, 17, 19 95:3, 6 96:3 97:4 101:20 102:2 116:5, 12 117:2, 5 128:4 129:14 131:15, 24 133:4 134:7, 8 140:5, 23, 25 141:5, 6, 8, 11 143:18 144:6, 11, 16, 18 145:15 146:3, 10 147:19 149:18 150:21</p>	<p>151:14 152:15, 21 153:3, 5, 6, 7, 18 155:22 156:8, 11, 13 understanding 17:4, 19, 21 45:12 49:20 97:1, 9 105:5 137:20 149:13, 16 understood 89:20 95:16 144:15 146:5 149:21 152:19 Unemployed 113:1 UNITED 1:1 units 54:13 universe 79:10 unusual 46:5, 7 UPS 25:9, 13, 18 26:3, 13, 16, 18 30:10 46:22 upstairs 37:19, 21 up-to-date 60:8, 9 use 79:11 usually 68:19</p> <p>< V > Vaclaw 5:13 128:6 various 18:14 VCA 98:15 103:19 107:6 vehicle 68:4 70:9, 15 vehicles 70:10 verge 38:19 versus 107:5 Vicksburg 6:22 victims 103:24 104:21 107:11 Vinita 132:11 visitors 46:8, 16 vocational 16:20 vs 1:2</p> <p>< W > wait 28:15 33:9,</p>	<p>11 37:23 waiting 43:18 waive 81:19 83:1 walk 31:17, 25 34:15 69:22 walked 24:21 35:12 92:23 want 5:9 41:11 46:10 56:1 65:12 75:10, 11, 22 78:4, 9 79:3 81:17 83:1 113:9 130:6, 15 136:1 140:2, 8 148:13, 20 153:22 154:1 wanted 52:21, 23 82:1, 6 100:5 102:12, 14 139:8 144:5 149:16 wanting 128:9 warehouse 12:15 14:3, 5 warehousing 14:9 warrant 26:25 27:5, 17, 19 28:4, 10, 16 30:19 31:2 33:1 36:16 37:11, 14 38:22, 25 40:11 41:3 58:21, 22 60:1, 2 61:15, 16 63:2, 10, 25 68:20 71:3 72:12 74:23, 24, 25 75:5 117:4, 15, 16, 17, 24 118:1, 4, 8, 13 warrants 21:13 22:12, 19 23:1, 10 26:20, 22 30:3, 15, 16 32:11 33:5 59:1, 2, 11, 15, 16, 23 62:18, 20 70:6 72:15 74:1 118:11, 12 Washington 22:22 24:20 27:1, 17, 25 28:23 29:7, 8 30:15 32:1 33:5 35:6 39:4, 5, 6 41:3 44:16, 17</p>	<p>45:3 58:23 59:24 60:2, 19 61:6, 12 69:19 71:6, 14, 16 72:9, 14, 19 74:24, 25 75:6 76:8, 20 79:24 121:4 122:11 124:22 125:5, 8, 23 129:12 131:25 132:5 133:6, 21 137:9, 15 138:10, 24 139:2 152:1, 8, 25 153:17, 25 watched 104:13 watching 71:12 Water 57:16 WATKINS 1:20 way 14:8 23:2 45:10 73:5 83:13 93:12 99:1, 2 108:21 113:2 130:12 142:18 weapon 86:14, 22 87:2 wear 111:20 wearing 5:7 week 25:21 30:11 49:23 50:4, 14, 15 54:25 55:3 57:4 74:16 120:24 141:7 weekend 28:14 weeks 57:10, 23 58:2 103:5 123:1 weight 92:11 welcome 130:4 well 16:11 19:23 24:11 28:12 29:2, 20 33:14, 20 35:23 38:3, 23 42:5, 19 43:25 44:12, 18 47:16 51:23 56:12 57:25 59:22, 25 66:19 71:16 73:6, 13, 14 96:10 99:2 107:8 111:3 112:24 128:22</p>
---	--	---	---

129:7 135:22 146:21 150:23 went 14:15 15:24 16:12 17:8 18:7, 8, 9, 19 19:9, 16, 25 23:3 33:23 34:17 35:6 37:19, 20, 21, 24 38:4 44:10 45:5 47:5, 7 52:14, 15 53:4 54:6 57:9 58:19 61:7, 8, 11 63:13 64:17 85:12 87:1 94:18 99:3 103:4, 11 104:9 112:22 129:22 132:13 134:13 137:1 138:21 139:19, 21 145:19 146:17 148:4 149:18 150:12 153:24 154:23 155:6 we're 5:20, 24 11:25 40:13 44:23 50:11 66:21, 23 67:18 81:23 91:22 100:2 101:18 108:17 109:11 127:6, 23 128:3, 10 133:21 137:14 138:7 140:12 141:2 142:9 We've 41:7 73:1 81:10 103:2 113:5 132:25 140:17 149:8 WHEREOF 160:7 Whew 23:20 152:3 Whichever 41:15 Williford 2:1 3:1 130:21 136:14 140:18, 22 141:5, 9 143:19 148:5, 11 152:14, 20 155:10 156:16 window 63:19	wire 51:6 53:25 54:12 wired 54:14 wires 49:1, 5 50:18, 19, 20, 24, 25 54:12 wish 82:21 WITNESS 9:5, 8, 12, 17 15:4 41:14 73:13 75:15, 19 100:12 104:10 125:17 126:6 127:8, 14 130:4, 13 136:13 141:3 143:17 148:8 155:1, 6 156:22 157:5, 6 158:17 160:7 witnesses 75:23 wondering 42:19 wood 12:16 13:12, 15, 22 words 82:7 84:17 96:6, 8 work 14:17 23:22 25:20 26:2, 18 41:12 43:6 49:7, 23 50:11, 14 52:1, 8, 16 53:14, 21 54:16, 19 55:19 56:21 57:4 74:16 110:8 119:5 122:15 worked 26:16 29:14 48:11, 12, 13 53:17 57:8 58:1, 9, 10 59:3 74:11 83:23 94:11 101:6 116:13 working 25:9 48:10 49:25 50:3 55:1, 20 58:3 61:20 62:2 92:7 119:25 128:22 works 75:13, 16 79:6 119:23 120:3	worst 157:5 wrap 75:12 write 10:13 13:25 48:18 126:12 write-ups 45:19, 22 writing 98:14 written 96:24 98:2 114:24 wrong 108:6 140:2 wrote 56:12 < Y > Y011/1 80:14 yard 11:18 16:3, 5, 6 17:22 29:14 41:25 44:24 45:4, 18, 22 99:19 yeah 10:8 14:5 16:5, 11, 13 18:16 19:21 20:7 21:5 24:3, 18 26:11 32:5 33:2 37:8 38:12 39:5 40:5 41:9, 18 46:1 50:1, 3 52:10, 23 53:3 56:4 57:21 58:19 59:21 61:18 64:13, 14, 24 65:10 66:20, 23 67:7, 21 72:23 75:19 76:17 80:3 83:25 84:16 86:19 96:25 101:12 108:24 111:14, 19 120:2 127:4 130:13 135:12 137:13 147:2, 5 149:4, 12 150:25 152:10 153:19 157:16 year 9:25 12:18 34:4, 5 37:3 141:7 years 10:8, 23 20:20 36:19 61:4 72:5 89:14, 20	90:23 96:16 97:17, 18 107:5, 6 108:2, 3 139:25 140:3, 9 141:3 144:13 Yeses 101:2, 4 YO 15:2, 5, 9 76:20 77:9 93:25 106:23 York 1:21 young 7:4 22:10, 15, 18 87:18 youthful 15:1, 4, 5 22:23 97:12 132:24 137:8, 15 144:1 149:1 150:5 152:1 < Z > zero 89:15, 22 Zoom 1:14
---	---	--	---

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA

RECEIVED
DEC 11 2020
PROFESSIONAL REPORTERS

AMANDA FEESTRA and
SHARONICA CARTER,

Plaintiffs,

v.

JARED SIGLER, Special Judge of the District Court of Washington County, in his official capacity; LINDA THOMAS, District Judge of the District Court of Washington County, in her official capacity; RUSSELL VACLAW, Associate District Judge of the District Court of Washington County, in his official capacity; OKLAHOMA INDIGENT DEFENSE SYSTEM, an Oklahoma state agency; STATE OF OKLAHOMA, ex rel. OKLAHOMA INDIGENT DEFENSE SYSTEM; CRAIG SUTTER, Executive Director of the OKLAHOMA INDIGENT DEFENSE SYSTEM; and OKLAHOMA INDIGENT DEFENSE SYSTEM BOARD OF DIRECTORS,

Defendants

Case No. 19-cv-00234-JFH-CDL

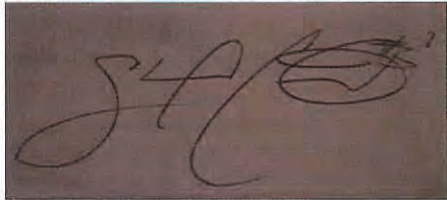
ERRATA SHEET – NOVEMBER 2, 2020 DEPOSITION OF SHARONICA CARTER

Page:Line	From	To	Reason
6:16	if you need	If you need	Transcription error
6:20	about of your background	about your background	Transcription error
6:21	Where were born?	Where were you born?	Transcription error
8:22	Cater	Carter	Transcription error
10:25	then, I was	that, I was in	Transcription error

RECEIVED
DEC 11 2020
PROFESSOR
PORTERS

Page:Line	From	To	Reason
29:12-13	Gilridge	Gilreath	Transcription error
29:23	Gilridge	Gilreath	Transcription error
30:2	Gilridge	Gilreath	Transcription error
32:9	detector	detector	Transcription error
33:18-19	set up you a	set you up with	Transcription error
41:15	clever	better	Transcription error
41:23	Gilridge	Gilreath	Transcription error
42:2-3	Gilridge	Gilreath	Transcription error
42:6	Gilridge	Gilreath	Transcription error
42:11	Gilridge	Gilreath	Transcription error
43:11	Gilridge	Gilreath	Transcription error
46:22	Gilridge	Gilreath	Transcription error
47:6	Gilridge	Gilreath	Transcription error
64:8	need my	need to pay my	Transcription error
65:7	Kevin	Devan	Transcription error
68:14	"They ain't find no guns. You're	They ain't find no guns. "You're	Transcription error
74:18	\$25. \$25 to \$30	25. 25 to 30	Transcription error
83:4	You	Your	Transcription error
109:10	Kevin	Devan	Transcription error
142:15	Jude	Judge	Transcription error

Pursuant to 28 U.S.C § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

A handwritten signature in dark ink on a light-colored background. The signature is stylized, appearing to start with a large 'S' and 'C'.

Sharonica Carter

December 10, 2020
Tallulah, Louisiana

RECEIVED
DEC 11 2020
PROFESSIONAL REPORTERS